Finproject S.p.A., in order to select professional figures to be included into their own staff, offers the possibility to respond to the job posted into "Job Opportunities" section of the Company web site, as well as the possibility of submitting your spontaneous application.

For this purpose, Finproject S.p.A. requires the candidate to provide any useful data to verify the eligibility to cover the job positions within the Company.

In compliance with the current Data Protection legislation and regulation (Legislative Decree 196/03 and EU Regulation n. 2016/679), Finproject S.p.A. invites you to read the following privacy notice, which has been designed and written in a simple and concise language to help you to clearly understand how we treat your personal data.

1. Method of personal data processing

Finproject S.p.A. receives and processes your data with respect and the greatest attention

Your personal data will be processed by Finproject S.p.A. on paper and/or electronically, by computer and/or telematics.

Finproject S.p.A. will warrant that your personal data will be:

- 1. Accurate and corresponding to what you have declared
- 2. Kept up to date, as a result of your communication of change;
- 3. Collected in a format that allows your identification and for no longer than necessary, in relation to the purposes of the data processing.



2. Purposes of data processing

We ask your data to see if you are the professional figure we are looking for

Finproject S.p.A. will process your personal data, included in the *curriculum vitae* which you have voluntarily uploaded in the section "Job Opportunities", solely for the purposes of personnel recruitment, selection and evaluation activities and to determine whether your professional figure is in line with the needs of the company.

Finproject S.p.A. reserves the right to remove the received data from its archives, in case it results inaccurate, incomplete or no longer up-to-date.

You provide your personal data voluntarily. Any refusal and/or failure on your part to supply requested

information may result in the Company being unable to carry out the necessary research and selection process and/or may result in it being unable to proceed with evaluating your job application.



3. Sensitive Data

We ask you an explicit consent to treat any sensitive data that may be contained in your CV and which you may revoke freely and at any time.

Where information provided contains sensitive data (i.e. data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership to political parties, trade unions, associations of a religious, philosophical, political as well as data suitable for revealing the state of health and sexual life), Finproject S.p.A. will processes such data only if receives your explicit consent. For this reason, Finproject S.p.A. ask you to provide an explicit consent for the use of such personal data. Any refusal and/or failure on your part to supply requested may result in the Company being unable to carry out the necessary research and selection process and/or may result in it being unable to proceed with evaluating your job application.

Your are free to revoke your consent at any time by sending an email to the address at the foot of this privacy notice, without prejudicing the lawfulness of processing prior to the revocation.



4. Communication and sharing of data

Finproject S.p.A. will do its best to limit the number of people charged with data processing

Your personal data may be communicated to the following persons and/or entities for the aforementioned purposes:

A. Finproject S.p.A. staff – Your personal data may be used by Finproject S.p.A. staff who has been assigned a specific role as Data Controller or Data Processor and who has entrusted with specific data processing tasks to protect the confidentiality of your data.

Your personal data will be made available only to those people charged with data processing, according to their job role or duties. These parties will be trained to prevent accidental loss, destruction, alteration, unauthorized access, disclosure or any illegal forms of data processing.

Your data may also be shared with other Third Parties entrusted with carrying out the following activities on behalf of Finproject S.p.A., such as:

- External consultants and law firms for managing the personnel recruitment and the evaluation; for delivering legal assistance and advisory services and for handling any legal disputes;
- Service companies (including computer services) responsible for managing all the activities related to contractual obligations (e.g., payroll, meal vouchers,) and IT activities (e.g. information system management, data entry);
- **Companies of the Finproject group** the Data Controller belongs to, for administrative and accounting purposes.

These companies act as external Data Processors (point n. 9) under the supervision and monitoring of Finproject S.p.A.

B. Finproject S.p.A. external area – according to the specific consent you have provided, your personal data may also be provided to other Data Controllers who will process your data in compliance with their privacy policy that you should read carefully.



Your personal data will never be disclosed, divulged or made available to unidentified parties.



6. Data retention

Your data will be kept for a period not exceeding the purposes for which the data were collected and subsequently processed, which is your recruitment

The personal data that you have provided will be kept for the period necessary to carry out the personnel evaluation activities and screening tests, however for no more than one year from the date of receipt.



7. Data transfer outside the EU

Your data could be transfer outside the EU, but we ensure a suitable level of protection

In accordance with art. 43 D. Lgs 196/03 and art. 44 GDPR, in order to simplify the selection of the personnel in Finproject Group, Finproject S.p.A. may transfer your personal data to the companies of the Group, located in countries not belonging to the European Union or to the European Economic Area.

In such case, Finproject S.p.A. will take contractual warranties (as subscription of standard contract terms approved by the European Commission) subscripted with the offshore companies that received the data; these contractual warranties provide the same level of data protection prescribed by the EU legislation.



8. Rights of the Data Subject

You have a right to access, to rectify, to be forgotten, to restrict to objet the data processing and to obtain the data portability

As a part of the processing of your personal data, you have the right to ask to Finproject S.p.A.:

- **Right of access**: you have the right at any time, to obtain confirmation as to whether or not your personal data are being processed and ask for clarification about the information included in this privacy notice;
- **Right to rectification**: you can request the rectification (integration or updating) or correction of your data if not accurate;
- **Right to erasure ("right to be forgotten")**: you can ask the erasure; if the consent is withdrawn or you oppose for legitimate reason to their treatment; if the personal data have been unlawfully processed, that is in case of a legal obligation of deletion or in case data related to persons under 16 years;
- **Right to restriction of the processing**: you may request to process your data solely for: the period necessary for the rectification; in case of unlawful processing and excluding any other data processing; in case the data we have kept can be useful for you to exercise your rights in court of law and, finally, if you oppose to the data processing and there is a review of the prevalence of our legitimate reasons to yours.
- **Right to object to the processing**: you can at any time object to the processing of your data, unless there are compelling and legitimate reasons for us to proceed with the data processing which override yours (for example, for our exercise or defense of legal claims).
- **Right to data portability**: you can ask to receive your data or to send it to another Controller you have chosen, in a structured, commonly used and machine-readable format.

We also inform you that you have the right to appeal to the local Data Protection Authority, which, in Italy, is the "Garante per la Protezione dei Dati Personali".

The abovementioned rights or any request relating to personal data processed by Finproject S.p.A. can thus be addressed to the following e-mail address: <u>privacy@finproject.com</u>