

POLICY FOR JOB CANDIDATES
ON THE PROTECTION OF PERSONAL DATA
PURSUANT TO ART. 13 OF LGS. D. NO. 196 OF 30.06.2003

Pursuant to art. 13 of Lgs.D. no. 196/2003, as amended and supplemented, **Altaeco S.p.a.**, with registered office in Via Giovanni Pascoli 4/6, 20010 Vittuone, Milan (MI) in the person of the legal representative pro tempore, as Data Controller, hereby informs data subjects about the processing purposes and methods of the data collected, its scope of disclosure as well as the nature of its provision..

PERSONAL DATA SUBJECT TO PROCESSING AND PROCESSING PURPOSE

The personal data subject to processing, essentially identification and CV details, as well as any sensitive data, collected from the data subject or from third parties used by the Data Controller for selection procedures, is processed and used in full compliance with the principle of correctness and legality and with the provisions of the law, in order to process the request of the data subject and, more precisely, to verify the prerequisites for recruitment and/or starting a collaboration. The collection will concern only common data; therefore, the candidate will not be required to indicate so-called sensitive data, as qualified by the art. 4 of Lgs.D. 196/2003, i.e. personal data capable of disclosing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature; as well as personal data capable of disclosing state of health and sex life. This without prejudice to the case in which the data in question needs be known to establish the employment relationship, with particular reference to the data subject possibly belonging to protected categories.

DATA PROCESSING METHODS

Data processing is carried out through IT procedures or in any case telematic means or on paper by internal or external parties specifically appointed for such purpose or committed to confidentiality. The data is stored in IT and electronic files, with full assurance of implementation of the minimum security measures required by law.

DISCLOSURE AND DISSEMINATION

The data collected will not be disclosed or disseminated. Disclosure to third parties, other than the Data Controller, Data Processors and persons in charge of processing identified and appointed pursuant to arts. 29 and 30 of Lgs.D. no. 196/2003, is envisaged only where necessary for the purposes indicated to external companies whose collaboration the Data Controller may make recourse to (such as IT support companies), which in any case guarantee the adoption of equivalent security and confidentiality criteria.

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RETENTION TIMES

The data will be kept by the Data Controller for the time necessary to fulfil the formalities required for selection of the candidate and in any case for no more than two years from its collection, unless the employment and/or collaboration relationship is established.

RIGHTS OF THE DATA SUBJECT

The Data Subject may exercise his/her rights as provided for by articles 7, 8, 9 and 10 of Lgs. D. no. 196 of 30 June 2003 by contacting the Data Controller. In particular, according to art. 7, the data subject has the right to obtain confirmation of the existence or otherwise of personal data related to him/her, including data that has not yet been recorded and to obtain that data in a clearly understandable form. The Data Subject has the right to obtain information regarding: a) the source of any personal data; b) the purposes and methods of processing; c) the logic applied in the event of electronic processing; d) identification details relating to the Data Controller, the data processors and the representative designated in compliance with article 5, paragraph 2; e) the subjects and categories of subjects to whom the personal data may be communicated or who may become acquainted with said data, in their capacity as data processors, persons in charge of data processing and appointed representatives in Italy. The Data Subject has the right to obtain: a) that said data is updated, amended and, if in the interest of the data subject, completed; b) that any data processed in violation of the law be cancelled, made anonymous or blocked, including any information that does not need to be held for the purposes for which it was collected or subsequently processed; c) receive confirmation that the operations in a) and b) have been made known, also as regards their content, to the parties to whom the data has been communicated or disclosed, except in cases where this is impossible or requires the use of means that are clearly disproportionate with the protected right. The Data Subject has the right to object to processing within the terms and in the manner provided for by the provisions mentioned above.

DATA CONTROLLER, DATA PROCESSORS AND PRIVACY COMMUNICATION

The Data Controller is **Altaeco S.p.A.**, with registered office in Via G. Pascoli 4/6, 20010 Vittuone, Milan (MI).

The updated list of data processors is available at the company's registered office. For any communication regarding articles 7 et seq of Lgs.D. no. 196/2003, as amended and supplemented, the Data Controller has provided the e-mail address privacy@altaeco.com

NATURE OF PROVISION

The provision of data is optional and is at the discretion of the candidate who, without any solicitation on the part of the Data Controller, submits his/her curriculum vitae. With regard to the data subsequently requested by the Data Controller, failure to provide such data shall make it impossible to proceed with verification of the prerequisites for recruitment and/or starting the collaboration and, therefore, to establish any relationship with the Data Controller.

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GRUPPO INDUSTRIALE

CONSENT

Consent to processing is not necessary pursuant to art. 24 of Lgs.D. no. 196/2003, as amended and supplemented, since the processing concerns data contained in the CVs spontaneously submitted by data subjects for the purposes of the possible establishment of an employment/collaboration relationship. Likewise for any sensitive data transmitted in the same manner by the Data Subject, for which consent is excluded by art. 26 of Lgs.D. no. 196/2003, as amended and supplemented, paragraph 3, letter B-bis).

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