

NOTICE FOR THE PROCESSING OF PERSONAL DATA PURSUANT TO EU REGULATION 16/679

1. IDENTITY OF THE DATA CONTROLLER AND CONTACT DETAILS

In accordance with current legislation and the provisions of art. 13 of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "Regulation"), we inform you that the Data Controller of the processing of the data you provide is

Reno De Medici S.p.A. (di seguito anche RdM)
Sede legale: Viale Isonzo 25 / 20135 Milano, Italia
Tel.: +39 0289966111 (r.a.) - Fax: +39 0289966200
Pec: renodemedici@pec.rdmgroup.com

2. Purpose and legal basis of the treatment

Your data will be processed mainly by computer and telematic means, for the purposes provided for by Regulation (EU) 2016/679 (RGPD), in particular for the following purposes:

A) Navigation data

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the communication protocols of the Internet. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with other data, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users connecting to the Site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and computer environment. The legal basis for this processing is our legitimate interest, namely the control and improvement of our website and services.

This category also includes data processed through the use of cookies. On this point, reference should be made to the provisions of the specific information notice.

B) Data relating to requests by the data subject

We may process information contained in any request for information you send us about goods and/or services ("request data"). The legal basis for this processing is our legitimate interest in maintaining the personal information of persons who voluntarily communicate with us.

(C) Data relating to applications

We may process personal data for purposes related to research, selection, evaluation of new professional resources to be included within our company. Information requested online does not normally include special categories of data (health, judicial, etc.).

When using the section of the site "Join Us"), however, there may be a transfer of your Personal Data falling within the special categories of Personal Data referred to in art. 9 of the Regulation, literally the "[...] data that can reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as process genetic data, biometric data

intended to uniquely identify a natural person, data relating to health or sexual life or sexual orientation of the person" if the same were contained in the CV to be uploaded on our site. We remind you that with regard to the transmission of special categories of Personal Data, but in the absence of specific expression of consent to process such data, RdM Group can not be held responsible for any reason, nor can it receive disputes of any kind, since in this case the processing will be allowed as it relates to data made manifestly public by the person concerned, in accordance with art. 9(1)(e) of the Regulations.

However, we specify the importance, as already mentioned above, of expressing our explicit consent to the processing of special categories of Personal Data, if you decide to share such information.

We also inform you that, for the purposes of selection, RdM may analyze the social profiles of a professional nature that you make freely available on the Internet (e.g. LinkedIn).

The legal basis for this processing is consent (Article 6(1)(a) EU Reg. 679/16).

D) Newsletter

We may process the information you provide to us in order to subscribe to our email notifications and/or newsletters ("Notification Data"). The notification data can be processed in order to send you the relevant notifications and/or newsletters. The legal basis for this processing is consent (Article 6(1)(a) EU Reg. 679/16).

The provision of your data for the purposes referred to in points A and B is mandatory as the processing is necessary for the provision of services or to respond to requests from the person concerned.

The provision of Personal Data for the purposes referred to in points C and D is optional, but avoiding to do so would make it impossible to find requests or evaluate CVs, to allow access to the reserved area of the site or to proceed with the sending of the newsletter.

4. Recipients of personal data

Where strictly necessary to achieve the purposes indicated above, your personal data may also be communicated:

- to employees and collaborators of the Data Controller, in their capacity as authorized persons for the treatment of data (or so-called "persons in charge of the treatment");
- third parties who perform outsourcing activities on behalf of the Data Controller, in their capacity as data processors;
- to judicial or supervisory authorities, administrations, public bodies and agencies;
- to companies and professional operators that provide electronic data processing services and consultancy for software and information technology and management of information services relating also to the management of the hosting and the website;

5. Data transfer to third countries

Your personal data will be processed by the Data Controller within the territory of the European Union.

If for technical and/or operational reasons it is necessary to use entities located outside the European Union, or it is necessary to transfer some of the data collected to technical systems and services managed in the cloud and located outside the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the Regulation and authorized on the

basis of specific decisions of the European Union. All necessary precautions will therefore be taken in order to ensure the full protection of personal data by basing such transfer: a) on adequacy decisions of the third country recipient expressed by the European Commission; b) on adequate guarantees expressed by the third-party recipient pursuant to art. 46 of the Regulation; c) on the adoption of binding corporate rules.

6. Period of data retention

Your personal data will be stored for the period of time strictly necessary to pursue the specific purposes indicated above in compliance with civil and tax conservation obligations and the limits provided for by law;

In some cases, it is not possible to specify in advance the periods of retention of personal data. In such cases, we will determine the retention period based on the following criteria: necessity, legal obligation, our legitimate interest.

For the purposes indicated in letter C) for the time strictly necessary for the management of the assessment and selection process of the candidates and in any case not later than 12 months from the end of the selection process.

for the purposes indicated in letter D) until the request of cancellation from the newsletter.

7. Rights of the Data Subject

Data subjects have the right to ask the data controller to access and rectify or erase their personal data or to restrict the processing of their personal data or to object to their processing (Art. 15 and 21 of the DPO).

If the conditions are met, the interested parties also have the right to lodge a complaint with the Data Protection Authority in accordance with the established procedures.

More specifically, the following rights may be exercised at any time:

- a. Access to personal data: obtain confirmation of the processing of data concerning you and access to the following information: the purposes, categories of data, recipients, the period of retention, the right to request rectification, erasure or restriction of the processing or opposition to the processing and the existence of an automated decision-making process including profiling and the logic used;
- b. Request for rectification or cancellation or limitation of processing operations concerning you; "limitation" means the marking of stored data with the aim of limiting their processing in the future;
- c. Objection to the processing: oppose, on grounds connected with your particular situation, the processing of data for the performance of a task carried out in the public interest or for the pursuit of a legitimate interest of the Data Controllers;
- d. Data portability: in the case of automated processing carried out on the basis of consent or in execution of a contract, to receive data about you in a structured format, in common use and readable by an automatic device;
- e. Withdrawal of consent to the processing for marketing purposes, both direct and indirect, market research and profiling; the exercise of this right does not in any way affect the legality of the processing carried out before the revocation;

f. Make a complaint in accordance with art. 77 GDPR to the competent Data Protection Authority, for Italy, the “Garante per la protezione dei Dati Personali” is responsible, which can be contacted through the contact details on the website <http://www.garanteprivacy.it>.

T

he aforesaid rights may be exercised by sending a specific request to the Data Controller through the contact channels indicated in art. 2 of this information notice.

Requests to exercise your rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity and the number of requests will this period be extended by a further 2 (two) months.

8. Updates

This information document is in force from 4th July 2018

We may update this policy from time to time by posting a new version on our website.

We recommend that you check this page occasionally to make sure you are satisfied with any changes to this policy.

We may inform you of significant changes to this policy by e-mail or other means of communication.