

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

Bonzai S.p.A (hereinafter referred to, for the sake of brevity, as the "**Company**"), as the data controller, wishes to inform you, pursuant to Article 13 of European Regulation 679/2016 on the protection of personal data ("**Regulation**") and national legislation, including the individual provisions of the Supervisory Authority ("**Data Protection Authority**"), where applicable, that the personal data you provide during the interview and recruitment process will be processed in compliance with the legislative and contractual provisions in force for the purposes and in the manner indicated below.

1. Type of personal data processed

This Company mainly processes the following categories of personal data:

- identification and contact data (such as, for example, name, surname, date of birth, tax code, address, telephone contact details, residence, domicile);
- data on previous work experience (such as, for example, positions held, date of employment, company role, salary and any benefits, periodic evaluations, other data relating to work experience), professional qualifications and professional information disclosed by the candidate;
- tax and income data (such as, for example, tax code, previous salary);
- data provided through the sending of the curriculum vitae (such as, by way of example, pictures on the CV) and other data collected in the personnel screening and assessment activity, including those provided when filling in the information form;
- data disclosing health (documentation of a disability situation or of classification in a protected category);
- any other data provided by the candidate.

2. Processing purposes and legal basis for processing

The purposes of collecting and processing the personal data provided by you during the interview for selection purposes and indicated in your curriculum vitae relate to the creation of a database used to select candidates for possible future recruitment; the data will therefore be processed by the data controller exclusively for purposes relating to personnel selection procedures, for the possible performance of activities prior to the conclusion of the employment contract and to comply with laws, contracts or regulations.

The processing will in any case be carried out, including by means of IT tools, by the data controller and by any appointed data processors and persons in charge of the processing, in compliance with all precautionary measures guaranteeing security and confidentiality pursuant to and in accordance with the provisions of Article 32 of the Regulation.

Pursuant to Art. 6.1 b) and f) of the Regulation, the provision of your data for the above-mentioned purposes does not require your consent.

The provision of the aforementioned data (such as, for example, identification data, tax code, health data) is necessary to carry out activities related to personnel selection, and failure to provide such data makes it impossible for the Company to consider the application as part of a selection process.

BONZAI SPA

Sede legale

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3. Processing modes

Personal data will be processed by the Company and its employees using information technology (and manual systems) in accordance with the principles of correctness, fairness and transparency laid down in the applicable legislation on the protection of personal data and protecting the confidentiality of the person concerned and their rights by adopting appropriate technical and organisational measures to ensure a level of security that is appropriate to the risk.

The Company, as part of the selection activity, may carry out verification of the information provided (e.g. academic qualifications and previous employers) for selection purposes only.

4. Data storage

Your personal data will be processed and stored for the time strictly required to pursue the purposes they were collected for.

Your personal data will also be processed by electronic means and will be kept for the period of time necessary to carry out the selection procedures or, in the event of a positive outcome, for the duration of the employment relationship.

Should a job offer not be made at the end of the selection procedures or should it not be accepted, your personal data will be kept for a maximum of 12 months from the closing date of the aforementioned selection procedure.

Your data will also be kept for this period in order to be able to prove, in the event of a dispute, that you have conducted the selection and recruiting processes without discrimination, in a fair and clear manner.

Personal data necessary for the fulfilment of civil and tax obligations will also be retained afterwards, in compliance with the retention periods envisaged by the regulations applicable from time to time.

Once these terms have expired, the data will be deleted and/or destroyed.

5. Data communication, disclosure and transfer

Your data may be shared with specific categories of recipients, such as persons who can access the data by virtue of provisions of the law, regulations or Community legislation, within the limits provided for by these rules.

Your data may be disclosed to other companies belonging to the Bcube/Bonzai Group for the purpose of managing the personnel selection process.

The data are generally not transferred outside the European Union; however, should it be necessary to transfer the data to countries outside the EU, including to countries that do not offer adequate protection, for specific needs connected with the selection, the Company undertakes to ensure compliance with the provisions of Chapter V of the GDPR by guaranteeing adequate levels of protection and safeguards, including contractual safeguards, in accordance with the applicable rules, which include the drafting of standard contractual clauses.

6. Rights of the data subject

The data subject may exercise, in relation to the data processing described therein, the rights provided for by the Regulation (Articles 15-21), including:

- receive confirmation of the availability of your personal data and access to their content (access rights);
- update, modify and/or correct your personal data (right of amendment);

- request the cancellation or restriction of the processing of any unlawfully processed data, including data whose retention is not necessary for the purposes the data were collected or otherwise processed (right to be forgotten and right to restriction);
- object to the processing (right to object);
- revoke consent, where given, without prejudice to the lawfulness of the processing based on the consent given prior to revocation;
- file a complaint with the Supervisory Authority in the event of a breach of data protection regulations;
- receive a copy of the data in electronic format concerning them rendered in the context of the selection process (e.g. data concerning previous work experience) and request that such data be passed on to another data controller (right to data portability).

Those who wish to exercise these rights may contact the Data Protection Officer (hereinafter only '**Data Protection Officer**' or '**DPO**' for short) by sending an e-mail to **dpo.gdpr@bonzaigroup.it**

7. Identity and contact details of the Data Protection Officer

The Data Controller is Bonzai S.p.A. with registered office in **Corso Italia no. 22** - 20122 Milan (MI), in the person of its pro-tempore Legal Representative.

A Data Protection Officer has been designated and can be contacted at the e-mail address given in point 6.