

Privacy Notice pursuant to Articles 13 and 14 of EU Regulation No. 679/2016

Dear Sir/Madam,

We hereby inform you that, in compliance with EU Regulation 2016/679 on the protection of personal data, your personal data will be processed for the purposes set out below in connection with the application and recruitment process.

Accordingly, SOFINTER S.p.A., Tax Code and VAT No. 08554110158, with registered office at Via Conservatorio 17, Milan, registered with the Milan Monza Brianza Lodi Companies Register, represented by its legal representative and acting as Data Controller (hereinafter the "Controller"), wishes to inform you, pursuant to Articles 13 and 14 of EU Regulation No. 679/2016 (hereinafter "GDPR"), that it is necessary to process your personal data in compliance with applicable legislation and as further specified below.

1. Subject Matter of the Processing and Categories of Data Processed

The Controller processes the personal identification data you provide when applying for vacancies within the Group, through unsolicited applications, or data provided by third parties (e.g. recruitment and selection agencies). By way of example, such data may include personal details (e.g. first name, surname, address, date and place of birth, etc.) and contact details (e.g. telephone numbers and email addresses).

2. Purposes, Legal Basis for Processing and Consequences of Failure to Provide Data

Your Data are processed lawfully and fairly for the purposes described below.

A. Performance of a Contract or Pre-contractual Measures

This necessity constitutes the legal basis for the related processing (Article 6(1)(b) GDPR), namely carrying out the assessments required for the possible establishment of an employment or collaboration relationship with one of the companies within the Sofinter Group.

Should the assessment be successful, the Controller will need your data in order to prepare the documentation necessary for establishing the employment or collaboration relationship (e.g. work permit, driving licence, etc.).

B. Compliance with Legal Obligations

This necessity constitutes the legal basis for the related processing (Article 6(1)(c) GDPR), since the Controller is required to comply with legal obligations or obligations connected with the contractual relationship, including those arising from workplace health and safety regulations, as well as the proper management of relationships with authorities, supervisory bodies and third-party public entities for purposes connected with specific requests, compliance with legal obligations or other procedures.

Providing the data required for these purposes is a legal obligation. Failure to provide such data may prevent the Controller from managing the contractual relationship.

C. Consent to Processing

Processing may also concern personal data falling within the category of "special categories of personal data" that you may provide when submitting your CV (such as data revealing racial or ethnic origin, religious, philosophical or other beliefs, trade union membership, health status, disability or membership of protected categories, or the holding of political office) or subsequently during the recruitment process.

Your explicit consent is required for the processing of such data (Articles 6(1)(a) and 9(2)(a) GDPR). It remains understood that, pursuant to Article 111-bis of the Italian Privacy Code, consent is not required with regard to personal data contained in a CV spontaneously submitted by the candidate.

3. Processing Methods

Your Data are processed through the operations indicated in Article 4(2) GDPR, namely: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of Data.

Your Data are processed both in paper form and electronically and/or through automated means.

The acquired Data are processed in full compliance with applicable laws and with the principles of lawfulness, fairness, transparency, data minimisation, and protection of your confidentiality and rights.

Refusal to provide data necessary for the recruitment and assessment process may compromise the establishment of an employment or collaboration relationship.

4. Data Retention Period

The Controller retains Data in compliance with local laws and internal corporate policies and procedures for the time necessary to fulfil the purposes described above and satisfy its legitimate business interests, legal obligations, or to establish, exercise or defend legal claims, and in any event for no longer than two years from the date of your signing of this document.

Once the retention period for these purposes has expired, the Data will be securely deleted.

For further information regarding the document retention policy, you may request a copy of the Personal Data Retention Policy by writing to comitato.privacy@sofinter.it.

5. Categories of Recipients of Personal Data

Your Data may be made accessible for the purposes described above:

- To employees and collaborators of the Controller in Italy and abroad, acting as authorised persons pursuant to Article 29 GDPR and Article 2-quaterdecies of the Italian Privacy Code;
- To other companies linked to the Controller in any capacity (parent, subsidiary and/or affiliated companies) in Italy and abroad, and to their respective employees and collaborators.

Where such entities are established outside the EU, the Controller ensures that transfers of Data outside the EU will be carried out in compliance with applicable legislation, including the execution of the Standard Contractual Clauses approved by the European Commission, as set out in the following section.

6. Data Transfers

Data are stored on servers and storage systems located within the European Union.

However, where necessary, the Controller may transfer Data to countries outside the European Union or the European Economic Area that

have been recognised by the European Commission as providing an adequate level of protection for personal data, or, failing that, only where an adequate level of protection equivalent to that of the European Union is contractually guaranteed and the rights of data subjects can be exercised.

In such cases, the Controller guarantees that the transfer of Data outside the EU will take place in compliance with applicable legal provisions, including the execution of the Standard Contractual Clauses adopted by the European Commission.

The Controller shall apply all safeguards required under applicable data protection legislation to such transfers.

7. Rights of the Data Subject

Pursuant to Article 13(2)(b) and (d), and Articles 15 to 22 GDPR, we inform you that:

- a) You have the right to obtain from the Controller access to your personal data, rectification or erasure of such data, restriction of processing, or to object to processing, as well as the right to data portability and the right to withdraw any consent given at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- b) You have the right to lodge a complaint with the Italian Data Protection Authority, following the procedures and instructions available on the Authority's official website: www.garanteprivacy.it;
- c) Any rectification, erasure or restriction of processing carried out at your request, unless impossible or involving disproportionate effort, will be communicated by the Controller to each recipient to whom the personal data have been disclosed. The Controller will inform you of those recipients if you request it.

8. Exercising Your Rights

You may exercise your rights or submit a request at any time by contacting:

SOFINTER S.p.A.

Piazza Buffoni 3

21013 Gallarate (VA), Italy

Email: comitato.privacy@sofinter.it

Alternatively, you may contact the Data Protection Officer (DPO) at:

dpo@sofinter.it

The response period is one month. This period may be extended by two additional months in particularly complex cases. Should this occur, the Controller will inform you of the reasons for the extension within one month.

The Controller reserves the right to request information necessary to verify the identity of the applicant.

As a general rule, exercising these rights is free of charge unless requests are manifestly unfounded or excessive, in which case the Controller may charge a reasonable fee based on the administrative costs incurred.

9. Data Controller and Data Protection Officer

The Data Controller is SOFINTER S.p.A., Tax Code and VAT No. 08554110158, represented by its legal representative, with registered office at Via Conservatorio 17, Milan, and operational office at Piazza Buffoni 3, Gallarate (VA), Italy.

The list of categories of Data Processors is kept at the Controller's operational office.

Data Protection Officer (DPO): dpo@sofinter.it

The undersigned, having read the above Privacy Notice, expressly and freely:

☐ CONSENTS ☐ DOES NOT CONSENT

to the processing of his/her special categories of personal data for the purposes set out in Section C, including, for example, data revealing racial or ethnic origin, religious, philosophical or other beliefs, trade union membership, health status, disability or membership of protected categories, and the holding of political office.

Place and Date: _____

Signature of the Data Subject: _____