

WEBSITE VISITOR PRIVACY POLICY WITH NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION NO. 679/2016

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PRIVACY POLICY

Welcome to our website www.sofinter.it (the "Website").

We invite all users visiting the Website to read this Privacy Policy, which applies while browsing the Website.

PRIVACY NOTICE

Sofinter S.p.A., with registered office in Milan, Via Conservatorio 17, and operational office in Gallarate, Piazza Buffoni 3, Tax Code and VAT No. 08554110158, represented by its legal representative and acting as Data Controller (hereinafter the "Controller"), of the personal data of users/visitors consulting the website www.sofinter.it, invites you to read this notice pursuant to Article 13 of Regulation (EU) No. 679/2016 (the "GDPR") regarding the processing of your personal data.

This notice also contains important information regarding the management of the aforementioned website, in compliance with applicable legislation and as further specified below.

This notice applies exclusively to the website www.sofinter.it and not to any other websites that may be consulted through links available on this Website.

1. Subject Matter of the Processing

1.1 Browsing Data

The Controller will process the personal identification data (by way of example only: first name, surname, address, telephone number, email address, etc., hereinafter also referred to as "Data") voluntarily provided by you in order to use specific services available through www.sofinter.it, as well as browsing data normally accessible through the IT systems and software procedures used to operate the Website.

These include personal data whose transmission is implicit in the use of Internet communication protocols.

This category includes, among others:

- IP addresses or domain names of users' computers;
- URI (Uniform Resource Identifier) addresses of requested resources;
- Time of the request;
- Method used in submitting the request to the server;
- Size of the file obtained in response;
- Numerical code indicating the status of the server response (successful, error, etc.);
- Other parameters relating to the user's operating system and IT environment.

1.2 CV Data

The Controller will process personal data (for example: first name, surname, address, telephone number, email address, etc.) voluntarily provided by you in order to use personnel search and recruitment services.

For further information, please refer to:

<https://www.sofinter.it/lavora-con-noi/>

1.3 Cookies

Cookies are small text files that websites send to the user's device, where they are stored and then retransmitted to the same websites during subsequent visits.

For further information, please refer to:

<https://www.sofinter.it/cookie-policy/>

2. Purposes of Processing

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

A. Browsing Data

a) To enable the Controller to obtain anonymous statistical information regarding the use of www.sofinter.it and verify its proper functioning;

b) For security purposes (anti-spam filters, firewalls and virus detection systems), to prevent attempts to damage the website or its users and, in general, to prevent unlawful or harmful activities;

c) To perform any function necessary or instrumental to the operation of the Website, including the installation of technical cookies to improve Website functionality, as further described in the Cookie Policy.

No cookies are used for the transmission of personal information, nor are persistent cookies or user tracking systems employed.

The use of session cookies, which are not permanently stored on the user's device and disappear when the browser is closed, is strictly limited to the transmission of session identifiers necessary for secure and efficient navigation of the Website. Session cookies used by this Website avoid the use of other potentially privacy-invasive technologies and do not allow the acquisition of personally identifiable user data.

d) To enable the Controller to fulfil legal, accounting, tax, administrative and contractual obligations related to the management of the Website and the provision of requested services, as well as to properly manage relationships with authorities, supervisory bodies and public entities.

B. Data Voluntarily Provided by the User

This category includes information voluntarily submitted through the "Contact Us" and "Careers" sections of the Website, and subsequently by email, including:

- First name;
- Surname;
- Email address;
- Data contained in CVs;
- Information entered in online forms.

These data, including CVs submitted voluntarily, will be used by the Controller to evaluate the user's suitability for potential employment opportunities and, where appropriate, to initiate recruitment procedures.

This processing may also involve the acquisition of the sender's contact details necessary to respond to requests and enquiries, including complaints of any nature.

Please note that the Controller will not process any special categories of personal data or criminal conviction data pursuant to Articles 9 and 10 GDPR voluntarily provided through the "Contact Us" section or by email.

3. Processing Methods

Your Data are processed through the operations referred to in Article 4(2) GDPR, including:

- Collection;
- Recording;
- Organisation;
- Structuring;
- Storage;
- Adaptation or alteration;
- Retrieval;
- Consultation;
- Use;
- Disclosure by transmission;
- Dissemination or otherwise making available;
- Alignment or combination;
- Restriction;
- Erasure;
- Destruction.

Your Data may be processed both manually and electronically.

All processing activities are carried out in compliance with applicable law and the principles of lawfulness, fairness, transparency, data minimisation and protection of your privacy and rights.

The Controller does not knowingly process personal data relating to individuals under 18 years of age.

4. Data Retention Period

The Controller retains Data in compliance with applicable legislation and internal policies and procedures for as long as necessary to:

- Achieve the purposes described above;
- Protect its legitimate business interests;
- Fulfil legal obligations;
- Establish, exercise or defend legal claims.

Once retention is no longer necessary for these purposes, the Data will be securely deleted.

For further information on the Company's retention policy, you may request a copy by contacting: comitato.privacy@sofinter.it

5. Legal Basis of Processing

The processing of the above Data is necessary to enable you to browse the Website and allow the Controller to respond to your requests. Where required for specific purposes, your express consent will be collected.

6. Disclosure and Access to Data

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

- Employees and collaborators of the Controller acting as Data Processors, authorised persons, sub-processors or system administrators;
- Parent, subsidiary and affiliated companies of the Controller, both in Italy and abroad, and their employees and collaborators;
- Third-party companies and service providers acting as external Data Processors, including suppliers providing ancillary or supporting services.

The Controller may also disclose personal data to:

- IT providers for system development and technical support;
- Auditors and consultants;
- Compliance and legal advisors;
- Law enforcement authorities;
- Successor companies or business partners in connection with mergers, acquisitions or other corporate transactions;
- Police forces, armed forces and public authorities where required by law.

Where such recipients are established outside the European Union, the Controller ensures that transfers will take place in accordance with applicable legislation.

7. Data Transfers

Data are stored on servers located within the European Union.

Where necessary, the Controller may share Data with affiliated companies or transfer Data outside the European Union.

In such cases, the Controller ensures that all transfers are carried out in compliance with applicable legal requirements and with appropriate safeguards under data protection legislation.

8. Nature of Data Provision and Consequences of Failure to Provide Data

Provision of Data relating to browsing activities is mandatory in order to access the Website and use its functionalities.

Provision of Data voluntarily supplied by users is likewise necessary to enable the Controller to:

- Respond to requests submitted through the "Contact Us" section;
- Provide requested information;
- Evaluate job applications submitted through the "Careers" section.

Without such Data, the Controller will not be able to process the relevant request.

9. Rights of the Data Subject

As a data subject, you have the rights provided by Articles 15 to 21 GDPR, including the right to:

- Obtain confirmation as to whether personal data concerning you are being processed;
- Access your personal data;
- Obtain information regarding:
 - The source of the Data;
 - The purposes and methods of processing;
 - The legal basis of processing;
 - The logic applied in automated processing;
 - The identity of the Controller and recipients;
- Request updating, rectification or completion of Data;
- Request erasure, anonymisation or restriction of unlawfully processed Data;
- Exercise the right to data portability;
- Object to processing;
- Lodge a complaint with the competent Data Protection Authority;
- Withdraw any consent previously provided at any time.

Regarding data portability, you may request that your personal data be provided in a structured, commonly used and machine-readable format or transferred to another controller.

Generally, portable data include identification and contact data.

10. Exercising Your Rights

You may exercise your rights at any time by contacting:

Sofinter S.p.A.

Piazza Buffoni 3

21013 Gallarate (VA), Italy

Email: comitato.privacy@sofinter.it

The Controller will respond within one month.

This period may be extended by two additional months in particularly complex cases, in which case the Controller will inform you of the reasons for the extension within one month.

The Controller may request information necessary to verify your identity.

As a general rule, exercising your rights is free of charge, unless requests are manifestly unfounded or excessive.

11. Data Controller and Data Processors

The Data Controller is:

Sofinter S.p.A.

Registered Office: Via Conservatorio 17, Milan, Italy

Operational Office: Piazza Buffoni 3, Gallarate (VA), Italy

Tax Code and VAT No. 08554110158

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