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Privacy Notice regarding the processing of personal data pursuant to Article 13 of EU Regulation 2016/679 (GDPR) and Italian Legislative Decree 196/03 (Italian Data Protection Code), as amended by Italian Legislative Decree 101/18.

Dear Candidate,

AKIFIX S.P.A. (hereinafter also referred to as the “Company” or “Data Controller”), pursuant to Article 13 of EU Regulation 2016/679 and Italian Legislative Decree 196/03, as amended, hereby informs you that the personal data you have provided as part of your application will be processed in compliance with current legislation on the protection of personal data, in accordance with the methods and for the purposes set out below.

Data Controller and Persons Authorised to Process Data

- The Data Controller of your personal data is: AKIFIX S.P.A., with registered office at Corso Italia, 27 - 39100 Bolzano (BZ), which can be contacted by telephone on 0731-619025 or by email at akifix@akifix.com.
- The person authorised to process your personal data on behalf of the Company is: the current Head of the HR Department.

Types of data processed

- The personal data subject to processing are those provided by you as part of your application. In particular, the categories of personal data may include, by way of example and without limitation:
 - Personal and identification details (first name and surname, date of birth, place of birth, nationality, tax code, marital status, etc.);
 - Contact details (residential or registered address, email address, telephone number and similar details);
 - Data relating to education, professional experience and activities undertaken.

Candidates are advised not to include in their Curriculum Vitae (hereinafter also “CV”) data belonging to special categories pursuant to Article 9 of the GDPR (such as data relating to health, political opinions, religious beliefs, trade union membership, etc.), unless this is strictly necessary for the purposes of applying for specific job positions (for example, membership of protected categories under Italian Law No. 68/1999). Any inclusion of such data will be processed exclusively with the explicit consent of the data subject.

Personal data is collected and processed in accordance with the principle of data minimisation, limited to what is necessary for the purposes set out in this notice. Irrelevant or excessive data will not be taken into account.

Legal basis and methods of processing

- The processing of your general personal data (personal details, contact details, and information relating to education and professional experience) is based on Article 6(1)(b) of the GDPR, as it is necessary for the performance of pre-contractual measures requested by you when submitting your application.
- The processing of any data belonging to special categories within the meaning of Article 9 of the GDPR (e.g. health-related data, such as membership of protected categories) voluntarily provided by you in your CV is based on your explicit consent, pursuant to Article 9(2)(a) of the GDPR, which you will be asked to give by ticking a specific box when submitting your application.
- Personal data will be processed both on paper and electronically, in a lawful, fair and transparent manner, in full compliance with current legislation, with the adoption of appropriate technical and organisational measures to ensure its security in accordance with Article 32 of the GDPR.

Purposes of Processing and Nature of Provision

- Your data is collected and processed for the following purposes: assessment of your application, management of the recruitment process and verification of the suitability of your professional profile to the Company’s organisational needs.
- The provision of your personal data is optional. However, failure to provide the data necessary for the assessment of your application (e.g. identification details, CV, contact details) will make it impossible for the Company to proceed with the selection process.
- AKIFIX S.P.A. reserves the right to remove the data received from its records if, following a check, it is found to be inaccurate, incomplete or out of date.

Communication and disclosure of data

- Your personal data may be used and processed only by the Company’s internal employees and staff, including the current Head of the HR Department, designated as persons authorised to process personal data pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Italian Legislative Decree 196/2003, and duly instructed regarding confidentiality obligations and the security measures to be adopted, in accordance with the purposes set out above.

Access to personal data is restricted solely to those persons who require it by virtue of their role or position within the organisation.

- Furthermore, the data may be used by external third parties carrying out instrumental activities on behalf of the Company, designated as Data Processors pursuant to Article 28 of the GDPR through a specific contract providing adequate safeguards for the protection of personal data. By way of example:

Akifix S.p.A.

Sede logistica e amministrativa: Viale Caduti sul Lavoro, 9 - 11 - 13 - 60030 Monsano - Ancona - Italy
Tel. +39 0731 61 90 25 Fax +39 0731 61 92 80

Sede logistica Nord Italia: Via dell'Adige, 5 - 39040 - Cortaccia - Bolzano - Italy
Tel. +39 0471 81 78 00

Sede legale: Corso Italia, 27 - 39100 Bolzano - Italy

C.F./P.IVA/ R.I. Bolzano 02395720424 Capitale sociale € 3.122.222,00 i.v. - Numero REA BZ-216432

Società sottoposta ad attività di direzione e coordinamento da parte di Akifix Holding S.r.l. - P.IVA/C.F. 03189170214

Website: www.akifix.com **e-mail:** info@akifix.com akifix@akifix.com





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- External consultants for the recruitment, selection and assessment of staff, for the management of disputes and legal assistance, firms and companies providing assistance and consultancy services, in accordance with the aforementioned relationships;
- Service providers (including IT service providers) entrusted with specific tasks relating to contractual obligations (payroll, meal vouchers, IT systems management, entities carrying out data entry activities, etc.).

➤ The full, up-to-date list of persons authorised to process personal data can be requested by emailing the following address: akifix@akifix.com.

Transfer of Data Outside the EU

➤ Your personal data, provided as part of your application, is stored in the cloud with the Company's web hosting provider, whose servers are located in the United Kingdom.

➤ This transfer of personal data outside the European Economic Area takes place in accordance with Article 45 of the GDPR, pursuant to the adequacy decision adopted by the European Commission regarding the United Kingdom (Implementing Decision (EU) 2021/1772 of 28 June 2021), which guarantees a level of protection of personal data equivalent to that ensured within the European Union.

Automated decision-making

➤ The Company does not use automated decision-making, including profiling, within the meaning of Article 22 of the GDPR, for the assessment of applications.

Data retention periods

➤ Your personal data will be processed for the duration of the selection process and will be retained in accordance with the following terms:

- CVs received in response to a specific recruitment advertisement: the data will be retained for the period necessary to assess the application and in any event for no longer than 6 months from the date of receipt, unless the data subject consents to a longer retention period;
- CVs sent unsolicited: the data will be retained for the period necessary to assess the application and in any event for no longer than 6 months from the date of receipt, unless the data subject consents to a longer retention period;
- Data of HIRED candidates: the data will be retained for the duration of the employment relationship and for 10 years following its termination, in compliance with applicable legal obligations.

Once the aforementioned periods have elapsed, personal data will be deleted or irreversibly anonymised. Further information regarding the retention period for personal data and the criteria used to determine this period may be requested by sending a written communication to the Data Controller at the following email address: akifix@akifix.com.

Rights of the data subject

➤ You may, at any time by email, request from the Data Controller: access to, rectification or erasure of the personal data processed; restriction of the processing of personal data concerning you or to object to such processing; where applicable, withdrawal of consent without prejudice to the lawfulness of processing based on consent given prior to withdrawal; data portability.

➤ Furthermore, you have the right to lodge a complaint with the Data Protection Authority in the event of a breach of your rights by Akifix S.p.A., using the contact details available on the website www.gdpd.it or by writing to the certified email address: protocollo@pec.gdpd.it.

To exercise your rights, you may contact the Data Controller at the addresses indicated above. The Data Controller is required to assess and respond appropriately to any request you may make to exercise the aforementioned rights within 30 days of receipt, unless there is a justified reason preventing this or an extension of the deadline is necessary in particularly complex cases.

Changes to this notice

The Data Controller reserves the right to amend or update the content of this notice, in whole or in part, in accordance with any changes to applicable legislation or changes to the methods of processing personal data. Any amendments will be made available on the Company's website and will take effect from the date of publication.

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