

## PRIVACY POLICY CONCERNING THE DATA OF RECRUITMENT CANDIDATES

EUROPEAN REGULATION No. 2016/679 (herein after "GDPR") is intended to guarantee that the processing of personal data is carried out in compliance with the rights, fundamental freedoms and dignity of individuals, especially regarding confidentiality and personal identity.

In accordance with Art. 13 of the afore mentioned Regulation and with the General Provision of the Guarantor on Video Surveillance dated 8 April 2010, we are providing you with the following information:

1. **Data controller** is E-PHARMA TRENTO Spa with registered office in Trento (Trento), Italy, via Provina 2 (herein after "Data Controller"). Any request for information about personal data protection must be sent to the registered office of the Data Controller or to the e-mail address [privacy@e-pharma.com](mailto:privacy@e-pharma.com)

The Data Protection Officer can be contacted at the following address: [dpo@e-pharma.com](mailto:dpo@e-pharma.com)

### 2. Purpose of processing

The Data Controller processes the following personal data that you disclosed during the selection process and during your job interview with the Data Controller (herein after "**Data**" or "**Personal Data**"):

- Identifying and contact data such as, but not limited to, first name, last name, residential and home addresses, place and date of birth, e-mail, telephone number, tax registration code, data contained in CV, employment data, salary data, as well as data on education and professional experience;
- Evaluative data such as, but not limited to, notations, evaluations, etc. about you that may have been collected during interviews and/or provided by third parties.

### 3. Processing purpose and legal basis for processing

Your personal data is processed, without your prior consent, for the following purposes:

**3.1 for the performance of a contract and/or in order to take steps prior to entering into a contract** (art. 6 § 1 lett. b) GDPR), in particular:

- a) for the proper conduct of the recruitment process (e.g., application management);
- b) to allow you to apply for a specific position;
- c) to use your profile also for positions other than those for which you have applied and for which your profile is suitable and compatible with what is sought;
- d) for the possible fulfillment of pre-contractual and contractual obligations, necessary for the establishment of the employment relationship;

**3.2 for the fulfilment by the Data Controller of legal obligations, such as:** the fulfilment of specific obligations under the law, company regulations, collective agreements, national and EU regulations as well as arising from provisions issued by authorities empowered to do so by law (Art. 6 § 1 letter c);

**3.3 the pursuit of a legitimate interest of the Data Controller**, in particular: the prevention and suppression of unlawful acts, as well as the protection of the

rights and legitimate interests of the Data Controller and/or third parties, including in court: the interest of the Data Controller corresponds to the right of action constitutionally guaranteed by Article 24 Const. (art. 6 § 1 lett. f))

#### **4. Processing method**

The processing of your data is carried out, both on paper and by computer, by means of the operations of collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. The Data Controller has taken appropriate technical and organisational security measures to protect your data and minimise the risk of destruction, loss (including accidental loss), unauthorised access/use, or use incompatible with the initial purpose of collection.

#### **5. Video surveillance**

In accordance with the General Provision by the Video Surveillance Authority dated 8/4/2010, we hereby inform you that the Company has installed a video surveillance system at its headquarters.

The video surveillance system is designed to protect corporate assets; video images collected can be used to prevent, deter and prosecute criminal events. Any personal data collected and processed through the video surveillance system consist of images of people and things that transit within the range of operation of such systems, that have been installed in the immediate vicinity of the entrances, both inside and outside the building, as notified by appropriate signage. Images are recorded and stored by personnel appointed by the Data Controller and can only be viewed by the latter, and by the Data Processor, as well as by Judicial or Police authorities.

All images collected will be processed in compliance with the principles of lawfulness, fairness and transparency, as provided by law, and in such a manner as to guarantee their safety and to protect the privacy of any person concerned. Once collected, images are stored for 48 hours and then deleted, except for special requirements related to holidays or Company closure, or in case of specific requests by the Judicial or Police authorities. The system operates 24/7.

#### **6. Data storage**

The Data Controller processes personal data for as long as necessary to fulfil the above purposes and in any case no longer than 12 months after collection if an employment relationship is not established or, if an employment relationship is established, for 10 years after its termination. Once the storage period has expired, the data will be deleted or anonymized.

#### **7. Provision of data**

The provision of your personal data is optional. Refusal to provide such data will result in the impossibility of continuing the selection and, possibly, the recruitment.

#### **8. Access to data**

Your data may be accessed for the above purposes by:

- a) employees and/or contractors of the Data Controller (e.g., human resources department), in their capacity as data processors and/or internal data controllers and/or system administrators;

- b) third parties (e.g., parent and subsidiary companies, accountant, payroll and labour consultant, etc.) who perform activities on behalf of the Data Controller and who will process the data in their capacity as external Data Processors.

## **9. Communication of data**

Your personal data may be disclosed, without your prior consent, for the above purposes to Public Administrations, Ministry of Finance, Revenue Agency, ministerial bodies and competent Authorities, local authorities (regions, provinces, municipalities), provincial and regional Tax Commissions, welfare and assistance funds, LHUs, Associations and Trade Union Representatives, Universities/Internship Promoter Agencies and Credit Institutions, recruitment companies and/or employment agencies, etc., who will process the data at their request as autonomous data controllers.

## **10. Transfer of data**

The data will be processed within the European Union. Should your data be transferred outside the European Union, the Data Controller assesses the impact of data transfers and adopts, if applicable, the most appropriate safeguards (e.g., adequacy decisions or standard contractual clauses)

## **11. Rights of the data subject**

The Data Controller informs you that, as the data subject, if the limitations provided by law do not apply, you have the right to:

- a) obtain confirmation of the existence or non-existence of your personal data, even if not yet recorded, and that such data be made available to you in an intelligible form;
- b) obtain indication and, where appropriate, a copy:
  - i. of the origin and category of personal data;
  - ii. of the logic applied in case of processing carried out with the aid of electronic instruments;
  - iii. of the purposes and methods of processing;
  - iv. of the identification details of the Data Controller and of Data Processors;
  - v. of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them, in particular if recipients from third countries or international organisations;
  - vi. when possible, the period of data storage or the criteria used to determine this period;
  - vii. of the existence of an automated decision-making process, and if so, the logic used;
  - viii. of the importance and expected consequences for the data subject;
  - ix. of the existence of adequate safeguards in case of data transfer to a non-EU country or international organisation;
- c) obtain, without undue delay, the updating and rectification of inaccurate data or, when interested, the integration of incomplete data;
- d) obtain the cancellation, transformation into anonymous form or blocking of data (Art. 17 GDPR);
- e) obtain the restriction of processing (Art. 18 GDPR);
- f) receive, if the processing is carried out by automatic means, without

hindrance and in a structured, commonly used and readable format the personal data concerning you in order to transmit them to another Data Controller or - if technically feasible - to obtain direct transmission by the Data Controller to another controller (art. 20 GDPR);

g) object, in whole or in part, to the processing of your personal data (Art. 21 GDPR);

h) file a complaint with the Data Protection Supervisory Authority.

In the above cases, where necessary, the Data Controller will bring to the attention of the third parties to whom your personal data are communicated any exercise of rights by you, except in specific cases (e.g., when such fulfillment proves to be impossible or involves a manifestly disproportionate use of means compared to the protected right).

Subparagraph d) shall not apply to the extent that processing is necessary for the establishment, exercise or defence of legal claims.

#### **4. How to exercise your rights**

You may exercise your rights at any time:

- by sending a registered letter with notice of receipt to the Data Controller's address;
- by sending an e-mail to [privacy@e-pharma.com](mailto:privacy@e-pharma.com) or to [dpo@e-pharma.com](mailto:dpo@e-pharma.com).