

Acciaierie Venete S.p.A Share Capital € 63,000,000.00 Fully paid up Tax Code VAT No. IT 00224180281 TN Companies Register no. 00224180281 Economic Administrative Index TN 232400 **Registered office:** via Puisle, 4 - 38051 Borgo Valsugana TN, Italy **Headquarters/Administrative Office:** Z.I. Sud – Riviera Francia, 9 - 35127 Padova, Italy Tel. +39 049 8282820 (PBX) **Padua Sales Office** Z.I. Sud – Riviera Francia, 9 - 35127 Padova, Italy Tel. +39 049 8282820 **Brescia Sales Office** via Oberdan, 140 – 25128 Brescia, Italy Tel. +39 030 3384744

Certified email (PEC): accven.amministrazione@legalmail.it www.acciaierievenete.com Z.I. Sud – Riviera Francia, 9 – 35127 Padova, Italy
via S. Pellico – 7/11 – 35129 Padova, Italy
via Antonini, 82 – 25068 Sarezzo (BS), Italy
Località Breda, 1 – 25070 Mura (BS), Italy
Passo di Napoleone, 829 – Fraz. Volargne – 37020 Dolcè (VR), Italy
Via Andreuzza nr.34 int. 1 – 33030 Buja (UD), Italy
via Puisle, 4 - 38051 Borgo Valsugana (TN), Italy
Via Giuseppe Garibaldi, 5 - 25076 Odolo (BS), ItalyVia Vallesabbia, 1
- 25076 Odolo (BS), Italy

Plants:

PRIVACY POLICY FOR CANDIDATES PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION (EU) 2016/679

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 on the protection of personal data (hereafter the "GDPR" or "Regulation"), Acciaierie Venete S.p.A. (hereafter the "Company" or "the "Data Controller") hereby informs you that the personal data relating to you (hereafter "the data"), which have been provided directly by the Data Subject or collected from third parties, shall be processed pursuant to the Regulation and in compliance with the information set out below.

DATA CONTROLLER

The Data Controller is Acciaierie Venete S.p.A., with registered office at via Puisle 4, 38051 Borgo Valsugana (TN), Italy, email: <u>generale@acciaierievenete.com</u>

PURPOSE AND LEGAL BASIS OF THE PROCESSING

Personal data shall be processed for the following purposes:

- a) collecting data from candidates for recruitment purposes and the possible finalisation of a contract;
- b) filing CVs for future recruitment needs;

Processing the data in the curriculum you spontaneously submitted or made available for consultation through structures specialised in recruitment does not require consent, pursuant to Article 111-bis of Italian Legislative Decree 196/2003.

The data in the CV and collected during the interview shall be processed for pre-contractual purposes pursuant to Article 6(1)(b).

MEANS OF DATA COLLECTION AND PROCESSING

The Data are collected through:

- a) the spontaneous submission of CVs by the candidate to the company's email addresses or through the channels indicated on the Data Controller's website and social network pages;
- b) the consultation of specialised databases, in which the candidate has made his/her CV available for consultation by interested companies;
- c) recruitment agencies and companies specialising in recruiting personnel;
- d) any other means by which the candidates' curricula are made available to the company.

The processing is carried out using IT tools and hard copy materials, with due observance of data confidentiality and security measures.

The personal data contained in your CV, in the accompanying email and any information you spontaneously provide to better qualify your candidacy (e.g., pictures, certificates, etc.) are subject to processing.

Please be aware that for the purposes of paragraph 2, no data defined as "special" data under Article 9 of the Regulation are requested (e.g., affiliation with protected categories). Where the data subject spontaneously submits such data, they shall be processed in accordance with Article 9(2)(b).

The provision of data is optional; nevertheless, refusal to provide certain data may result in your inability to participate in the above selection procedures or an incorrect assessment of your professional qualities.

DATA RETENTION PERIOD

The data shall be processed for the time necessary to contact the person and for the subsequent interview or for filing curricula for future personnel recruitment needs for a maximum of 24 months, after which your data shall be deleted from the Data Controller's hardcopy and digital archives.



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DATA COMMUNICATION AND DISSEMINATION

The data collected shall be processed by the Controller's trained and authorised personnel, and in no case shall it be communicated, disseminated, sold or in any case transferred to third parties for unlawful purposes and, in any event, without duly informing the Data Subjects and obtaining their consent, where required by law. Personal data shall not be transferred abroad to non-EU countries or International Organisations that do not guarantee an adequate level of protection, recognised, pursuant to Article 45 of the GDPR, based on an adequacy decision of the EU Commission. Your data may be managed by companies used by the Data Controller to select, recruit and evaluate candidates, and which operate as independent Data Controllers.

DATA SUBJECT'S RIGHTS

Articles 15-22 of the Regulation grant the data subject the power to exercise the following rights:

•to request confirmation of the existence or non-existence of their personal data (Article 15(1));

•to obtain information concerning the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated, and whenever possible, the retention period (Article 15(1)(a), (c));

•to obtain the rectification and erasure of data (Articles 16 and 17);

•to obtain the restriction of processing (Article 18);

•to obtain information from the Data Controller on the recipients to whom the personal data have been transmitted and any rectification or erasure or restriction of processing (Article 19)

•to obtain the portability of the data, i.e., receive them from a Controller in a structured, commonly used and machine-readable format and transmit them to another Data Controller without hindrance (Article 20)

•to object to automated decision-making concerning natural persons, including profiling (Articles 21 and 22);

•Where processing is based on consent, you may withdraw it at any time (Article 7(3));

•When a personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall communicate a personal data breach to the data subject without undue delay (Article 34);

7. EXERCISE OF DATA SUBJECT RIGHTS

The above rights may be exercised by submitting a request to the Data Controller, either directly or through an address orally or by forwarding an email message to the following authorised party, generale@acciaierievenete.com. The request is made freely and without formality by the data subject, who is entitled to receive appropriate feedback within a reasonable period, depending upon the circumstances of the case.

To exercise his/her rights, the data subject may avail him/herself of the services of non-profit bodies, organisations or associations whose statutory objectives are in the public interest and which are active in the field of protecting data subjects' rights and freedoms concerning personal data protection, by granting a specific mandate for such purpose. The data subject may likewise be assisted by a trusted party.

To know your rights, lodge a complaint, and stay up to date on the legislation protecting individuals concerning the processing of their personal data, you can contact the Italian Data Protection Authority, consulting its website at http://www.garanteprivacy.it/.