

Personal data processing policy

Policy pursuant to article 13 of EU Regulation 2016/679 for the protection of personal data (GDPR)

Pursuant to article 13 of EU Regulation 2016/679 (hereinafter GDPR), Tuvia Italia S.p.A. (hereinafter Tuvia or the Controller) - with registered office in Via Quintiliano 27, 20138 Milan - as Controller of personal data processing, in the person of its legal representative pro tempore, hereby informs that the personal data provided by you will be processed by Tuvia manually or by electronic or automated, computerized or telematic means, with logics strictly related to the purposes listed below and, however, in order to ensure the security and confidentiality of data.

Purposes, legal basis and lawfulness of processing

Personal data is processed by the Data Controller pursuant to article 6 of the GDPR.

The following are the specific purposes of processing and the related legal bases:

Processing purposes	Legal basis of processing
Acquisition and screening of the curricula and job applications of the candidates to work for the Data Controller	Consent

Categories of recipients of personal data

The personal data provided will not be communicated to external recipients by Tuvia Italia.

The data will also be processed by Privacy Delegates, as well as by parties specifically authorized to processing by the Data Controller, pursuant to the GDPR.

Personal data processed by Tuvia Italia will not be disseminated.

Non-EU transfers

For the pursuit of the processing purposes described above, the personal data provided may be transferred to the recipients indicated above in Italy and abroad.

In no case will your personal data be transferred outside the European Union.

Personal data retention period

The personal data processed by Tuvia will be stored at the registered office of the Controller for the time necessary to execute the contractual relationship, as well as for that required by civil, fiscal and regulatory provisions. Subsequently, the data will be archived until the term provided for by law with reference to the individual rights that can be applied. After said terms, your data will be anonymized or deleted, unless it is necessary to keep it for other and different purposes provided for by express provision of the law.

Below is the detail of the duration of the data retention period for the purposes described above, or the criteria used to determine said period:



Purposes	Categories of personal data	Maximum terms provided for cancellation
Acquisition and screening of the curricula and job applications of the candidates to work for the Data Controller	<ul style="list-style-type: none"> • Tax ID and VAT • Name, address or other personal identification elements (company name, first name, last name, place and date of birth, work address, private address, telephone number, fax number, e-mail address, certified e-mail address) • Data relating to the family and to personal situations (marital status, minors, children, dependent persons, relatives, others belonging to the family unit) • Work (information on current employment and previous occupations, professional skills, remuneration, fringe benefits) • Education and culture (education curriculum) • Aptitudes and aspirations of the candidate • Data on the candidate's behaviour (physical appearance, approach to the company) • Racial or ethnic origins • Religious beliefs, belonging to religious organizations • Philosophical or other beliefs, belonging to philosophical organizations • Political opinions • Belonging to political parties or organizations • Belonging to trade unions or trade union organizations • State of health • Profiles deriving from the administration of personality tests and others 	12 months

Automated decision-making process

For the pursuit of the processing purposes described above, no decision is made based solely on automated processing that produces legal effects concerning the parties concerned or that significantly affects them in a similar way.

Rights of the party concerned



Pursuant to and for the purposes of the GDPR, parties concerned are entitled to the following rights that they may exercise towards the Data Controller:

- a) right to obtain from the Data Controller confirmation of whether the processing of personal data concerning you is in progress and, in this case, obtain access to the personal data and information provided for by article 15 and in particular to those related to the processing purposes, to the categories of personal data in question, to the recipients or categories of recipients to whom the personal data has been or will be communicated, to the retention period, etc.;
- b) right to obtain, where inaccurate, the correction of personal data concerning you, as well as the integration of the same if they are considered incomplete, also in relation to the processing purposes (article 16);
- c) right to delete data ("right to be forgotten"), in one of the cases referred to in article 17;
- d) right to limitation of processing, in the cases provided for by article 18;
- e) right to opposition to processing pursuant to article 21;

These rights may be exercised upon request to be sent by:

- registered letter with return receipt to the Controller to the address Via Quintiliano 27, 20138 Milan
- e-mail to the e-mail address: privacy@tuvaitalia.com

Lastly, it is recalled that parties concerned have the right to file a complaint with the Guarantor for the protection of personal data or with another supervisory authority pursuant to article 13, paragraph 2, letter d) of the GDPR.

Amendments to this Policy

This Policy may be amended. It is therefore advisable to consult the privacy section of the website www.tuvaitalia.com on a regular basis.



**REQUEST OF CONSENT TO THE PROCESSING OF PERSONAL DATA
(article 7 of the GDPR)**

In relation to the annexed Information for the processing of personal data, which the Controller has acknowledged, in the person of the legal representative pro tempore, according to EU Regulation 2016/679 requires **your free consent** to the processing of personal data for the purposes indicated below:

Processing purposes	<u>I provide Consent</u>	<u>I deny Consent</u>
Acquisition and screening of the curricula and job applications of the candidates to work for the Data Controller		

In case of non-consent to the processing of your personal data for the purposes set out above, Tuvia Italia will not be able to pursue the purpose of the processing.

Furthermore, pursuant to and for the effects of article 7 of the GDPR, you are **entitled to revoke your consent at any time without prejudice to the lawfulness of processing based on the Consent previously provided**. Your consent may be revoked as easily as it was granted, according to the methods indicated in the policy.

- The undersigned **as party concerned** declares **to be 16 years of age or older**.

Date

Name and Surname

Signature of the party concerned

