

## Information notice on the processing of personal data pursuant to Regulation (EU) 2016/679 ("GDPR")

### Candidates (Online)

#### DATA CONTROLLER

The data controller is the natural or legal person that decides how to use the personal data collected and for what purposes. Specifically, the data controller is the Company to which you have addressed your application.

Each Company acts as an autonomous data controller. The drafting of a joint information notice is therefore exclusively due to a simplified organisational approach adopted by the Group: there is in fact no joint controllership among the Companies.

- E.M.S. EURO MANAGEMENT SERVICES S.p.A.**  
Via Trivulzio 1, 20146, Milan, Italy
- EUROGROUP LAMINATIONS S.p.A.**  
Via Stella Rosa 48/50, 20021, Baranzate (MI), Italy
- CORRADA S.p.A.**  
Via Michelangelo Buonarroti 8, 20020, Lainate (MI), Italy
- EUOTRANCIATURA S.p.A.**  
Via Stella Rosa 48/50, 20021, Baranzate (MI), Italy
- EUROSLIT TOOLS S.r.l.**  
Via De Gasperi 10, 20066, Melzo (MI), Italy
- SAF S.p.A.**  
Via Industriale 14, 25080, Muscoline (BS), Italy
- DS4 S.r.l.**  
Via Giardini 32, 24066, Pedrengo (BG), Italy
- EURO AUTOMATION S.r.l.**  
Via Moriggia 14, 20900, Monza (MB), Italy

Each of which is hereinafter referred to as "Company" or "Controller" and can be contacted via e-mail at [privacy@eglagroup.com](mailto:privacy@eglagroup.com).

#### DATA PROTECTION OFFICER

The DPO is the party, designated by the data controller, who supports the latter in monitoring compliance with the GDPR, in raising awareness and providing information, as well as in other activities required by law, and acts as a point of contact for data subjects and supervisory authorities.

The Data Protection Officer can be contacted via e-mail at [dpo@eglagroup.com](mailto:dpo@eglagroup.com).

#### PERSONAL DATA PROCESSED

"Personal Data" means any information relating to an identified or identifiable natural person (defined as "data subject"); an identifiable natural person is one who can be directly or indirectly identified. Personal data may be "common" data (such as name, surname, e-mail address, IBAN, etc.) or special categories of personal data (data that, by their very nature, require the implementation of special safeguards).

The term "Data" refers to, by way of example, first name, surname, place and date of birth, residence, e-mail address and telephone contacts, educational qualifications, work experience and any additional data that you may have included in your curriculum vitae and/or included in the questionnaire that will be submitted to you during the interview (so-called "common" data), as well as data that may disclose, by way of example, your health conditions (such as your possible belonging to protected categories), that may be contained in your curriculum vitae or in any other documentation submitted to the Data Controller (**special categories of personal data**). The collection of special categories of personal data shall be carried out only when strictly necessary for the selection process.

In the absence of such circumstances, special categories of data will neither be requested nor taken into consideration when received.

Data are collected from the data subject (i.e. directly provided by you) and/or from third parties, such as recruitment companies, temporary employment agencies, social networks.

|  <b>PURPOSE OF PROCESSING</b><br><i>The personal data provided are processed for the various purposes indicated in this column: they specify the objective of the processing.</i><br><i>Each purpose is associated with a legal basis for processing and a retention period, which are specified on the right.</i>                                                                                                                                                                                                                                                                                                                                                                                                    |  <b>LEGAL BASES FOR PROCESSING</b><br><i>The legal basis is the condition that makes the data processing lawful; the legal bases are defined by the GDPR and can be, by way of example, consent of the data subject, performance of a contract, and compliance with a legal obligation. In this column, you can find the legal basis associated with each purpose of processing.</i> |  <b>DATA RETENTION PERIOD</b><br><i>Personal data may only be processed for the period of time necessary to achieve the purpose for which it was collected.</i><br><i>In this column, you can find the data retention period associated with each purpose of processing.</i> |
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| Purposes connected with or instrumental to the carrying out of the <b>activity of search and selection of candidates</b> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Performance of the contract to which the data subject is party or performance of actions at the request of the data subject prior to entering into a contract, pursuant to Article 6.1(b) of the GDPR.                                                                                                                                                                                                                                                                | For the entire duration of the selection process; upon its termination, the Data are deleted, without prejudice to any further retention you may have consented to (see below).                                                                                                                                                                                 |
| <b>Retain your Data for 2 years for possible future selections</b> , in case the selection for which you applied is unsuccessful. If you decide not to consent to the retention of your Data for future selections, your profile will not be precluded from being taken into account for the current selection; however, lack of consent will prevent your application from being taken into account for possible future selections.                                                                                                                                                                                                                                                                                                                                                                   | Consent of the data subject, pursuant to Article 6.1(a) and Article 9.2(b) GDPR.                                                                                                                                                                                                                                                                                                                                                                                      | For 2 years after the end of the selection process.                                                                                                                                                                                                                                                                                                             |
| <b>Verify, also through specialised companies, that the Data provided are truthful</b> , by using public information (including professional social network profiles, databases, web registers or publicly accessible multimedia archives).<br>In compliance with Article 29 Working Party's "Opinion on data processing at work", the processing is limited to information related to professional aptitude for work, necessary for the sole purpose of assessing the specific risks related to the type of activity to be carried out by candidates. The processing is carried out to the least intrusive extent possible, adopting all necessary measures to ensure a proper balance between the employer's legitimate interest in verifying and the fundamental rights and freedoms of candidates. | Legitimate interest of the Data Controller, pursuant to Article 6.1(f) of the GDPR.                                                                                                                                                                                                                                                                                                                                                                                   | For the duration of the selection process; after its conclusion, the Data are deleted.                                                                                                                                                                                                                                                                          |
| <b>Comply with the obligations and exercise the rights of the Company or the data subject</b> under applicable legislation, labour law, social security and social protection law, or national collective agreements, as well as provisions issued by authorities empowered to do so and by supervisory and control bodies.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Compliance with a legal obligation to which the Data Controller is subject, pursuant to Article 6.1(c) of the GDPR; for special categories of data, the processing is carried out pursuant to Article 9.2(b) of the GDPR.                                                                                                                                                                                                                                             | For the period of time required by the applicable law.                                                                                                                                                                                                                                                                                                          |
| If necessary, to ascertain, exercise or <b>defend the Data Controller's rights</b> in judicial or extrajudicial proceedings.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Legitimate interest of the Data Controller for common data pursuant to Article 6.1(f) of the GDPR; for special categories of data, the processing is carried out pursuant to Article 9.2(f) of the GDPR.                                                                                                                                                                                                                                                              | For the entire duration of the judicial or extrajudicial proceedings, until the time limits for appeal have been exhausted.                                                                                                                                                                                                                                     |
| After the aforementioned retention periods have elapsed, the Data will be destroyed or made anonymous, depending on the technical deletion and backup procedures and the accountability requirements of the Data Controller.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                 |

## PROVISION OF DATA

*For some processing purposes, it is necessary for you to provide your data – without which it would not be possible to pursue the purpose of the processing. For other purposes, provision of the Data may be optional.*

The provision of the candidate's Data is necessary for the performance of the search and selection processes. Refusal to provide the Data does not allow for the performance of said activities and will therefore not allow your application to be taken into consideration.

If the candidate does not give his or her consent to keep his or her Data for future selections for an additional time period of two years, his or her profile will not be taken into account for future selections, but only for current ones. The candidate's consent is not mandatory, as it is, in fact, free; thus, it may be withdrawn at any time.

## DATA RECIPIENTS

*In order to pursue the purposes of processing outlined in this information notice, the Controller may transmit some of your data to external parties, who act as data controllers and/or processors.*

*A data processor is a natural or legal person that processes data on behalf of the controller: the purposes and means of processing are always determined by the data controller.*

The Data may be communicated to entities acting as data controllers, including but not limited to:

- Group companies;
- Authorities, supervisory and control bodies (e.g. Agenzia delle Entrate, Guardia di Finanza).

Data may be processed on behalf of the Controller by external entities appointed as data processors, who perform specific activities on behalf of the Controller, including:

- companies, including companies belonging to the Group, that may support the Controller in selecting, recruiting and evaluating candidates;
- companies or professionals providing support for the implementation and maintenance of the Controller's computer system and applications;
- companies providing electronic storage services for administrative documents.

The full list of data processors will be made available upon request by contacting [privacy@eglagroup.com](mailto:privacy@eglagroup.com).

## PERSONS AUTHORISED TO PROCESS

*Personal data protection legislation requires that the persons authorised to process personal data be identified and given specific instructions regarding the processing.*

The Data may be processed by the employees of the company functions tasked with the pursuit of the aforementioned purposes, who have been expressly authorised to process the Data and who have received adequate operating instructions pursuant to Article 29 of the GDPR and Article 2-*quaterdecies* of Italian Legislative Decree 196/2003, as amended and adapted by Italian Legislative Decree 101/2018.

## TRANSFER OF PERSONAL DATA to NON-EU COUNTRIES

*Personal data benefit from specific safeguards within the European Union. For this reason, the GDPR requires that data subjects be informed of any transfer of data outside the Union. Such transfers must be accompanied by additional safeguards.*

There are no transfers of Data outside the European Union, with the exception of cases where data subjects apply for open positions abroad or for hybrid positions. In such cases, the Data may also be processed in the country of destination – only after adequate information has been provided to the affected data subjects.

## RIGHTS OF THE DATA SUBJECT and COMPLAINT TO THE SUPERVISORY AUTHORITY

*The GDPR grants various rights to the data subject, which must be made known by the data controller through the information notice on the processing of personal data, in a concise, transparent, intelligible and easily accessible form.*

By contacting the Company via e-mail at [privacy@eglagroup.com](mailto:privacy@eglagroup.com) or the DPO at [dpo@eglagroup.com](mailto:dpo@eglagroup.com), data subjects may request access to the Data concerning them, their rectification, integration or erasure, as well as the restriction of processing in the cases provided for by Article 18 GDPR. Data subjects may also object to the processing in cases of legitimate interest of the Data Controller pursuant to Article 21 GDPR. Where processing is based on consent or on the performance of a contract and is carried out by automated means, data subjects have the right to receive the Data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit them to another data controller without hindrance.

Data subjects also have the right to withdraw the consent given at any time.

Finally, data subjects have the right to lodge a complaint with the competent supervisory authority.