

CANDIDATE PERSONAL DATA PROCESSING POLICY

FORM PURSUANT TO ART.13 (GDPR 2016/679/EU) FOR APPLICATIONS SUBMITTED DIRECTLY TO SIRMAX S.p.A.

SIRMAX S.p.A., with headquarters in Viale dell'Artigianato, 42 - 35013 Cittadella (PD, Italy), as the Parent Company of **Sirmax Group**, intends to offer you comprehensive feedback on how your personal data is processed within the scope of your application and as far as it pertains to intra-group processing.

We therefore invite you to carefully read this notice, which, in its entirety, contains all the information you need to know on how we will use your data, the security measures taken to ensure its confidentiality, storage periods, and the ways you can exercise your rights.

The data processing described therein is based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, and confidentiality.

1. DATA CONTROLLER

The Data Controller is SIRMAX S.p.A,
VAT NUMBER: 00168180248
Address: Viale dell'Artigianato, 42 - 35013
Cittadella (PD, Italy)
General mail: info@sirmax.com
Dedicated email: privacy@sirmax.com
Phone number: +39 049 944 1111
PEC: Sirmax@pec.sirmax.com
Co-ownership: Sirmax Group Companies (the list can be
accessed via the institutional website)

The way intra-group data is communicated is done based on legitimate purposes, in compliance with Italian and European regulations, and with appropriate procedures to ensure the rights of data subjects are respected.

An abstract of intergroup agreements is available on request.

2. PERSONAL DATA BEING PROCESSED

The management of a cooperation relationship will require the acquisition of certain information about you, for example:

- First name/last name
- Age/date of birth
- Gender
- Address
- Contact information (email, phone etc.)
- Identity document information
- Nationality
- Passport and Residence Permit
- Education and training
- Qualifications/certifications
- Languages spoken and degree of proficiency
- Information about previous employment positions (cover letters etc.)
- Previous occupations, resumé
- Information gleaned from spontaneous applications
- Civil status
- Job expectations (Gross pay, benefits, bonus)

3. PURPOSE

The personal data you provide will be processed directly by **Sirmax S.p.a.** according to your requests, in order to:

- a. Evaluate whether your qualifications may be of interest to pursue an extended collaboration, and for recruitment purposes for the company **or its subsidiaries**
- b. Store your resumé or application in our system for future job positions (for 2 years)
- c. Send your application to other Group companies (including outside the EU)
- d. Preliminary recruitment checks related to contractual framing and truthfulness of statements.

4. LEGAL BASIS

(REF: art.6 par.1 (a)(b)(f); art. 9 p.2 (b) GDPR 2016/679/EU)

- a. Performance of a contract to which the data subject is a party or of pre-contractual measures taken at the request of the data subject (art.6 par.1 lett.b; art.49 par.1 lett.b)
- b. For the pursuit of the legitimate interest of the data controller or a third party (art.6 par.1 lett.f) in the intra-group sharing of candidate data
- c. To fulfill the obligations and exercise the specific rights of the data controller or the data subject in the field of labor and social security law and social protection (Art.9 p.2-b)
- d. Based on consent for the transfer of your data to group companies (Art.6 (1)(a); Art.49 (1)(a) for non-EU transfers)

5. MODE OF PROCESSING

Processing is carried out through automated means (e.g., spontaneous applications on our company website, electronic procedures and media referred from specialized agencies) and/or manually (e.g., on paper) for the time strictly necessary to achieve the purposes for which the data was collected and, in any case, in accordance with the relevant regulatory provisions. An authorized employee with information management training is always provided. No automatic decision-making process is adopted.

6. DATA SOURCES

Sirmax acquires data in the following ways:

- Submission of an application to an open position through a form on our company website or social channels
- Submission of an application to one of the Group companies with consent to the transfer your data to the Group companies
- Your application is received from one of the recruiting firms we work with
- Your application/interest in a position was brought to our attention by one of our staff members.

7. SECURITY MEASURES

Data is processed lawfully and correctly, taking appropriate security measures to prevent unauthorized access, disclosure, modification or destruction. The IT and/or telematic technical and organizational measures employed to store data are aimed at the stability and ethical delivery of the service. Your data will be stored in physical and digital archives at Sirmax S.p.A.'s headquarters on systems protected by security measures designed to prevent unauthorized access, dissemination, compromise of information, unintentional deletion and, moreover, arranged to make such information available only to authorized and legitimate access subjects. Our datacenters are on Italian soil and are constantly monitored to ensure their protection.

Personnel authorized to handle your information has received adequate training in secure data handling. Sirmax Group adopts a Privacy Organizational Model geared toward the ethical management of information.

8. OPTIONALITY OF DATA PROVISION

Data provision is always optional when not subordinated to the execution of a legal obligation or necessary for the performance of a contract. Failure to provide data may only result in the impossibility of starting a collaboration with Sirmax S.p.A. or its Group companies.

Considering the territorial scope of Sirmax, the candidate will be able to state their preferences as to whether they should be included in the selections of all Group companies, only European companies, only the Italian company, or whether the application should only be intended for the company to which they have applied.

9. COMMUNICATION OF DATA TO THIRD PARTIES

Your personal data may be disclosed to:

- a) Individuals authorized to process personal data by Sirmax S.p.A or Group companies, who are trained to respect confidentiality and regulations inherent to the protection of individuals and the processing of personal data
- b) All persons to whom the right of access to such data is granted as a result of an administrative or legal duty to which the Controller is subject or for compliance with a legal obligation
- c) All natural and/or legal, public and/or private persons for whom the communication of personal data is necessary or functional for the establishment and management of the employment relationship, in the manner and for the purposes outlined above, in particular to:
 - payroll processing centers
 - banks and credit institutions
 - professional firms and consultants
 - insurance companies for the provision of insurance services
 - public institutions
- d) Suppliers and Group companies who require personal data to carry out activities related to employee selection.

Individuals to whom information about you is transferred are bound by contracts that include confidentiality obligations and have been vetted in advance so that they offer adequate levels of data security and protection. The list of External Data Processors is kept at Sirmax S.p.A.'s head office.

SIRMAX S.p.A. Via dell'Artigianato, 42 - 35013 Cittadella - PD - Italy

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Share Cap. 10,000,000 Euros | Tax Code / VAT No. 00168180248 | R.E.A. PD305950

Group: FINCOMP PLASTIC S.p.A. | Tax Code 04604420283

10. DATA RETENTION

PERIOD

In the event that a collaboration is initiated:

At least 10 years after the termination of the relationship

If there are no active searches or if the application is rejected:

24 months, for possible additional collaboration opportunities

PLACE

Your data is stored in paper and digital archives at infrastructures residing within the European territory. There are no plans to transfer these outside the EU.

11. RIGHTS AND EXERCISING RIGHTS

You may request access to your personal data, as well as its rectification, deletion and restriction to **Sirmax Group** at any time; you may also request processing restrictions or object to processing (Articles 15-22 GDPR 2016/679/EU). You can do so without formalities or by completing the Data Subject Rights Management Form, which is available upon request by email or can be downloaded from the website and sent to the following email address:

privacy@sirmax.com

We will take care to respond to your request within one month from the date of its receipt; this deadline may be extended by an additional two months based on request complexity and volume.

In case of non-compliance with the request, it will be possible to file a complaint with the Supervisory Authority (Privacy Guarantor) under Art. 77 and to file a judicial appeal under Art. 79.