

PRIVACY NOTICE – JOB CANDIDATES **pursuant to art. 13 of Regulation (EU) 2016/679 (GDPR)**

EM MOULDS S.P.A. (hereinafter referred to as the "Company"), with registered office in Via Giorgio Saviane n. 6, 50127, Firenze (FI), which can be contacted at privacy@coppermoulds.com, inform you that, for managing recruitment and selection processes related to potential employment opportunities (regardless of the type of contractual relationship), acts as the Data Controller of candidates' personal data in these selection procedures.

In view of the importance accorded to the protection and security of the individuals to whom such data refers, the Data Controller has appointed a Data Protection Officer (hereinafter referred to as the "DPO"), according to Art. 37-39 of the European Regulation 2016/679 (hereinafter referred to as the "GDPR"). The DPO may be contacted for matters relating to the data processing, including the exercise of data subject's rights, at dpo.emmoulds@coppermoulds.com.

1. Purposes and legal basis of the data processing

The purpose of data processing is to manage recruitment and selection processes, encompassing the following activities:

- assessing professional profiles of interest based on submitted CVs;
- handling all phases of candidate evaluation and selection, including communications, interviews, and assessments (potentially using questionnaires);
- conducting preliminary activities necessary for the recruitment and on boarding process;
- asserting or defending a right in judicial, administrative, arbitration, or conciliation proceedings, as permitted by law;
- complying with legal obligations, codes, and procedures established by relevant authorities or institutions.

The legal basis of the data processing are as follows:

- executing pre-contractual measures for recruitment or initiating a collaboration;
- fulfilling obligations and exercising specific rights in labour law, social security, and social protection fields for any special category data provided in a CV (Article 9(2)(b) GDPR);
- the Data Controller's legitimate interest in verifying the candidate's suitability for the position and sharing relevant information with involved recipients and third parties, as per Article 6(1)(f) GDPR and in line with requirements set by Article 21(1) of Legislative Decree No. 101 of August 10, 2018 (published in the Italian Official Gazette No. 176 of July 29, 2019).

2. Categories of personal data processed and data processing methods

In addition to basic identification and contact data (name, surname, tax code, email, telephone, residential address, and other CV-related data), the Company may also process certain special categories of personal data (Article 9(1) GDPR). This includes information that could reveal health status, particularly if required for establishing an employment relationship, including data on potential inclusion in protected categories or results from pre-employment medical examinations.

The data processing will be carried out in full compliance with Chapter II (Principles) and Chapter IV (Data Controller and Data Processor) of the GDPR. In particular, personal data will be processed in a lawful, correct and transparent way towards the data subject, collected for the above-mentioned purposes, explicit and legitimate, as well as adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The data may be accessible to employees and collaborators of the Company adequately trained, in their capacity as authorized subjects to process within the Company (Article 28, paragraph 3, letter b) and 29 of the GDPR and Article 2 *quaterdecies* of the Italian Legislative Decree 196/2003 (amended by Legislative Decree 101/2018, "Privacy Code") or by external parties appointed as Data Processors (Article 28 of the GDPR).

3. Mandatory or optional nature of providing personal data and consequences of a refusal

Your personal data, collected or otherwise obtained by the Data Controller, are deemed necessary. Failure to provide this data will make it impossible for the Data Controller to carry out the activities central to the processing, which include:

- assessing your application during the personnel selection process carried out by the Data Controller, including through third-party suppliers/recipients;
- managing all stages of the recruitment process;
- handling any resulting processes.

4. Data retention period

The data will be collected, recorded and consulted for the purposes outlined above. It may be processed in both paper and digital formats and will be retained for up to 12 months. If the application process results in an employment contract, the application documents will be added to your personal file.

5. Personal data communication

Without your explicit consent (Article 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes outlined in point 1 to supervisory bodies, judicial authorities as well as all other entities legally mandated to receive this information to fulfil these objectives.

The categories of recipients include:

- third parties involved in recruitment activities (such as external recruitment agencies and providers of electronic communication services), acting as Data Processors under written agreements with the Data Controller;
- individuals authorised by the Data Controller who are bound by confidentiality agreements or legal obligations of confidentiality (e.g. employees and collaborators of the Data Controller).

6. Data Transfer to Third Countries

Management and storage of personal data shall be in servers located in European Union belonging to the Data Controller or to third-party companies duly appointed as Data Processors.

7. Data subject rights

Your rights pursuant to articles 15-22 GDPR encompass the following:

- Right to access
- Right to rectification
- Right to withdraw consent
- Right to erasure
- Right to restriction of processing
- Right to object to processing
- Right to data portability
- Rights in relation to automated decision-making and profiling

At any time and free of charge, with no particular formalities for your request, you can:

- obtain confirmation of the data processing performed by the Data Controller;
- access your personal data and know their origin (when the data is not obtained from you directly), the purposes and aims of the processing, the data of the subjects to which it will be disclosed, the time for which your data will be kept or the criteria useful to determining this;
- update or rectify your personal data so as to ensure that it is always exact and accurate;
- erase your personal data from back-up and other databases and/or archives of the Data Controller if, amongst other situations, it is no longer necessary for the purpose of the processing or if this is assumed to be unlawful and as long as the legal conditions are met; and in any case if processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in some circumstances, for example where you have challenged its exactness, for the period necessary to the Data Controller to verify its accuracy. You must be informed, in time, also of when the suspension period has expired or the cause for the limitation to processing ceased applying and, therefore, said limitation has been revoked;
- obtain your personal data, if received or processed by the Data Controller with your consent and/or if its processing takes place in accordance with a contract and using automated tools, in electronic format, also so as to send it to another data controller.

The Data Controller must proceed in this sense without delay and in any case at the latest within a month of receiving your request. The terms may be extended by two months, if necessary, considering the complexity and number of requests received by the Data Controller. In these cases, the Data Controller shall, within a month of your request, inform you and make you aware of the reasons for the extension.

You can exercise the rights under articles 15-22 of the GDPR in the following ways:

- sending an e-mail to privacy@coppermoulds.com;
- contacting the DPO at dpo.emmoulds@coppermoulds.com;
- sending a written request to the Data Controller's registered office.

In addition, it is always possible to submit a complaint to the competent Supervisory Authority (art. 77 GDPR).