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PRIVACY POLICY

pursuant to Article 13 of EU Regulation 679/2016 and applicable data privacy provisions

Introduction

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data (the "**Regulation**") and any other domestic and/or EU provision and/or regulation applicable to the protection of personal data, COIMA SGR S.p.A., with registered office in Piazza Gae Aulenti 12, 20154 Milan, Italy, Data Controller ("**Company**" or "**Data Controller**"), informs you that the personal data ("**Data**") that you provide in connection with your application or otherwise acquired in the course of your meeting with our Company, may be legitimately processed in accordance with the provisions below.

1. Data processing purposes and legal basis

The Data Controller collects and processes personal data relating to you for personnel recruitment and selection purposes. The information processed is necessary in order for our Company to carry out personnel search and selection activities (e.g. personal particulars, curricular information, previous work experience, belonging to protected categories, etc.). Below we describe the purposes for which your personal data ("**Data**") are processed and also the legal basis legitimising the processing thereof.

The Company processes Data for:

- (i) The acceptance and evaluation of your application for personnel search and selection purposes.
The legal basis of the data processing, in this case, is the implementation of pre-contractual measures adopted at your request (Article 6.1(b) GDPR);
- (ii) Subject to your consent, the sharing of your application with Coima Group companies exclusively for selection and evaluation purposes.
The legal basis of the data processing is consent (Article 6.1(a) GDPR), which may be given at the end of this document. The failure to provide consent will in no way compromise selection at our Company.
- (iii) purposes related to the fulfilment of obligations contained in laws, regulations, domestic and EU rules as well as provisions handed down by authorities empowered to do so by law.
The legal basis of the Data processing in this case is the fulfilment of obligations provided for by law and applicable regulations (Article 6.1(c) GDPR).

To pursue the purposes illustrated above, our Company will process "Personal" Data (e.g. personal particulars, contact data, professional experience, curricular experience) and "Special" Data, relating to membership of protected categories for the employment of persons with disabilities in conformity with applicable regulatory provisions (Article 9.2(b) GDPR).

Subject to the foregoing, the Company will acquire and use the personal data and information which you provide during the information-gathering meetings, including data contained in your CV, for the exclusive purposes of selection and management thereof. At any rate, we invite you not to include in your CV and/or communicate to the Company, during the meeting, any data of a sensitive nature (e.g. concerning your health, political opinions, sex life/orientation etc.), other than those which are legally required for CV selection and assessment purposes (e.g. membership of protected categories).

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2. Nature of the data provision and consequences of failure to provide data

The processing of Data is required in order to implement the purposes listed above, and any failure to provide such Data will make it impossible to proceed with evaluating the application.

The failure to provide the consent required in order for your profile to be communicated to Coima Group companies shall not compromise the assessment of your application at our Company.

3. Categories of persons to whom Data may be communicated

Data shall not be disclosed and may be communicated, subject to your consent (which you may freely express at the bottom of this privacy notice), for the aforementioned purposes to Coima group companies that may be interested in your professional profile. Coima group companies will process the Data as independent data controllers within the limits of the selection and recruitment purposes. The failure to provide consent will not invalidate the Company's evaluation of the candidacy, and will only prevent the personal data from being communicated to other companies of the Group for their own personnel selection purposes.

The data may also be communicated to companies, persons, associations or professional firms that provide assistance and consultancy or supply services to our Company, particularly (but not exclusively) in accounting, administrative, legal, tax, financial, management and IT matters. Those who are members of the categories indicated above will use Data as independent Data Controllers pursuant to law or as Data Processors.

These persons are established in EU countries. Personal Data are not transferred to non-EU countries by the Company and/or by those acting as Data Processors.

The list of entities to which Data are or may be disclosed can be requested from the Company by using the contact details indicated in the section entitled "*Rights of Data Subjects*".

4. Data retention criteria

Personal data which you provide will be retained for no longer than necessary in order to pursue the purposes for which they were initially collected and for the performance of activities connected and instrumental to the same, and will be deleted when the purposes for which they were initially collected and processed no longer apply.

In particular, the Company will keep personal data collected for personal research and selection purposes, in the event of an unsuccessful candidacy, for at most 5 years from the date on which they are provided, and the different data retention period depends on the seniority of the professional profile in question (the retention period - identified in a range between 18 months and 5 years - is directly proportional to the candidate's seniority).

5. Rights of data subjects

We inform you that you may, in the cases expressly provided for by the Regulation, exercise the rights set out in Articles 15 et seq. of the Regulation and in particular:

- (i) request confirmation that Data is being processed and, if so, request the Data Controller for access to information relating to such processing;
- (ii) request the rectification of inaccurate or incomplete data;
- (iii) request the Data Controller to delete Data;
- (iv) request the restriction of the data processing;

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- (v) request to receive Data concerning you in a commonly-used and machine-readable format, or request to have them transmitted directly to another data controller, if technically feasible (known as *data portability*).

You are also entitled to object, in whole or in part, for legitimate reasons, to the processing of Data concerning you.

You may exercise these rights by sending a request to the Company by e-mail to privacy@coimasgr.it.

Finally, if you consider that the processing of data provided violates personal data protection rules, you are entitled to file a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

Consent form

I have read and understood the privacy notice

- I consent
 I do not consent

to the communication of personal data processed in the course of my application for purposes of selection and evaluation of professional positions in other Coima Group companies

Data Controller

COIMA SGR SpA