

INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

(Pursuant to articles 13 - 14 EU Reg. 2016/679, of Legislative Decree 196/2003 and subsequent amendments and of the art. 1 bis Legislative Decree 152/1997 and subsequent amendments)

Dear Interested,

below we provide you with some information that you need to bring to your knowledge, not only to comply with the obligations under the legislation on the protection of personal data and the use of automated decision-making or monitoring systems in the context of the employment relationship, but also because transparency and fairness is a fundamental part of our business.

The Data Controller of your personal data is **PALLADIO GROUP** identified according to the definition of "entrepreneurial group" established by art. 4.19 EU Reg. 679/2016 and responsible towards you for the legitimate and correct use of your personal data and who you can contact for any information or request at the following contact details:

Data Controller: **PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA**

Headquarters: Via Cresole n. 8, 36031 Dueville (VI), IT

Contacts and contact details:

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|-----------|------------------------|
| Telephone | +39 0444 947111 |
| E-mail | info@palladiogroup.com |
| Website | www.palladiogroup.com |

Data Protection Officer (DPO):

dpo@palladiogroup.com

Data source: data collected from the data subject and/or from third parties such as professionals or personnel selection agencies, as well as from online recruiting services or sources accessible to the public (e.g. linkedin)

Your personal data are collected and processed for the purposes set out below together with the legal basis of reference:

PROCESSING: Search for personnel

| Purpose | Data Processed | Legal basis | Duration |
|--|---|-----------------|-----------------------------------|
| Search for personnel to join the company | Fiscal code and other personal identification numbers; name, address or other personally identifiable elements; job (current, previous occupation, CV, etc.); | Pre-contractual | 1 year from the year of selection |

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|--|--|--|--|
| | education and culture; professional quality certificates; email address; Province of residence; declared profession; topics of interest; gender m/f; | | |
|--|--|--|--|

Categories of recipients: the data could be communicated to authorized subjects and to data processors pursuant to art. 28 EU Reg. 679/2026 such as, by way of example and not limited to, personnel selection agencies;

PROCESSING: Selection of the Personnel

| Purpose | Data Processed | Legal basis | Duration |
|--|--|-----------------|-----------------------------------|
| Recruitment and selection of personnel | Fiscal code and other personal identification numbers; data relating to criminal convictions and offences; job (current, previous occupation, CV, etc.); education and culture; suitability for work; email address; Province of residence; declared profession; topics of interest; gender m/f; | Pre-contractual | 1 year from the year of selection |

Categories of recipients: the data could be communicated to authorized subjects and to data processors pursuant to art. 28 EU Reg. 679/2026 such as, by way of example and not limited to, personnel selection agencies;

* Duration: In addition to the time necessary for the accrual of the prescription terms in relation to reciprocal rights and the backup retention time.

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CHANGES TO THIS PRIVACY POLICY

The Data Controller reserves the right to make changes to this privacy policy at any time, notifying the interested parties. In case of non-acceptance of the changes made to this privacy policy, the interested party may request the Data Controller to remove their Personal Data.

Unless otherwise specified.

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DATA TRANSFER OUTSIDE EU

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with the express prohibition of transferring them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of interested parties, etc.).

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In addition to this information, to ensure that your data is processed as correctly and transparently as possible, you must be aware of the fact that:

- Except for the purposes based on consent, the provision of your data is a necessary requirement, otherwise it will not be possible to supply the goods or provide the requested service;
- you have the right to ask the data controller to access your personal data and to rectify or cancel them or limit their processing or to oppose their processing;
- if you have given consent for one or more specific purposes, you have the right to revoke this consent at any time;
- you have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data;
- the data will be processed using automated, semi-automated and non-automated methods;

Where required by this information letter, you have a legal obligation to provide your data otherwise you are subject to sanctions as required by law.

Furthermore, within the framework of the legislation relating to the right to information on the essential elements of the employment relationship and on the working conditions and related protection, pursuant to Legislative Decree 104/2022, the Data Controller informs that automated systems for decision-making or monitoring tasked with providing relevant information for the purpose of assuming or conferring the assignment are not in use.

Dueville (VI), 20/10/2022

PALLADIO GROUP