

PRIVACY POLICY TO PROTECT PERSONAL DATA
according to article 13 of EU Regulation 679/2016

Pursuant to article 13 of EU Regulation 679/2016 (“GDPR”), we hereby inform you that your personal data (“Data”) will be processed by LATTANZIO KIBS SpA (the “Company” or the “Data Controller”) as Data Controller.

1. Personal data processing purposes and legal basis

As soon as we receive your CV, your data will be included in a list of contacts, which may be used to send e-mail messages for the following purposes:

- a) To participate in a tendering procedure, project, or other initiatives from LATTANZIO KIBS – or from any other firm belonging to Lattanzio Group – at a national, European and international level after e-mail notification
- b) To keep in touch; to send any update about current projects, invitations to any event or professional information you may be interested in;
- c) To send commercial and marketing information related to offers and events offered by LATTANZIO KIBS SpA and other companies of Lattanzio Group.

The above said purposes do not arise from a legal obligation and data shall be provided voluntarily. The legal basis of the following data processing is the consent of the data subject, who may refuse it, being also entitled to withdraw it any time. Failing or refusing to provide his/her personal data, either totally or partially, shall result into the impossibility to comply with the purposes for which such data are being collected.

Any particular data provided by you spontaneously, if not relevant, will be immediately deleted from the CV, while if relevant (e.g. invalidity) they are processed only for the possible recognition of a specific benefit for the purpose of the possible establishment of a working relationship or similar with the society.

2. Processing modalities

Personal data shall be processed lawfully, fairly and in a transparent manner, by means of computer and/or telematic tools, as well as organizational modes and a logic involved being strictly related to the above said purposes and carried out by a properly trained staff.

The Company implemented proper security measures aiming to prevent any unauthorised access, disclosure, change or destruction of Data.

Proper organisational (roles and liabilities within both the business activity and the audit performance) as well as procedural and technical (firewall, antivirus and a number of up-to-date technologies) measures have been taken to protect Data.

3. Recipients of the personal data

For the purpose of specific projects/initiatives, you are involved in, your personal data being processed shall be transferred:

- To other EU Member States, in accordance with the provisions contained in the GDPR 2016/679, and will not be disclosed; however, they may be provided to the internal properly trained staff, who shall be authorized to process personal data.
- To non-EU countries towards whom an Adequacy Decision has been adopted, pursuant to GDPR art.45 and 46.
- To non- EU countries, in the absence of a decision pursuant to art. 45(3) or of appropriate safeguards pursuant to art.46, including binding corporate rules. The Company-Data Controller wishes to expressly inform you that such countries might lack a supervisory authority and protection principles concerning personal data processing or the rights of the data subject.

Such Data may also be disclosed to the companies of Lattanzio Group, as listed in the web site www.lattanziokibs.com, which the Company-Data Controller may indicate as Data Processor, if necessary.

4. Personal data retention period

Personal data shall be stored for maximum 24 months from the date of receipt and/or the date of the update of the registration; such term being elapsed, all data will be deleted.

5. Rights of the data subject

The data subject shall be entitled to exercise any time his/her rights under article 15 et seq. of the EU Regulation 679/2016 by sending an e-mail to privacy@lattanziokibs.com, which includes the subject matter of his/her request, the right he/she wish to exercise and a copy of his/her identity document. The rights of the data subject are listed below:

- Right of **access** the personal data being processed and to obtain a copy thereof (**article 15 of the EU Regulation 679/2016**)
- Right to obtain the **rectification** and integration of both inaccurate and incomplete personal data (**article 16 of the EU Regulation 679/2016**)
- Right to **erasure** of personal data where, for instance, the personal data are no longer necessary in relation the purposes for which they were collected or otherwise processed (**article 17 of the EU Regulation 679/2016**)
- Right to **restriction** of processing of personal data where, for instance, the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (**article 18 of the EU Regulation 679/2016**)
- Right to **data portability**, that is to say the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format (**article 20 of the EU Regulation 679/2016**)
- Right to **object** at any time to processing of personal data concerning him or her, where, for instance, personal data are processed for direct marketing purposes (**article 21 of the EU Regulation 679/2016**)
- Right **not to be subject to a decision based solely on automated processing** including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her (**article 22 of the EU Regulation 679/2016**) right.

6. Withdrawal of consent

Pursuant to **article 7**, the data subject shall have the right to withdraw his or her consent at any time by sending an e-mail to privacy@lattanziokibs.com, which shall include the subject matter of his/her request. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

7. To lodge a complaint

Every data subject shall have the right to lodge a complaint with a supervisory authority (**Article 77**). Without prejudice to any other administrative or non-judicial remedy, each data subject claiming that the processing of personal data related to him/her infringes the EU Regulation shall have the right to lodge a complaint with a supervisory authority.

8. Decisions based on automated processing

The Data Controller will not process the Data for the purposes hereto in a way that such processing may involve decisions based on automated processing.

9. Amendments

Should this privacy policy be amended, any amendment hereto will be duly published on our web site. Applicants who do not approve such amendments shall inform at any time the Data Controller; in doing so, his/her prior consent will be withdrawn.