

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### Selection

Pursuant to Articles 12 et seq. of EU Regulation 2016/679 ("GDPR" or the "Regulation"), and in general in compliance with the principle of transparency set out in the Regulation itself, the following information is provided regarding the processing of personal data (i.e. any information concerning an identified or identifiable natural person: "Data Subject") in connection with selection procedures, also making it possible to submit spontaneous applications with the possibility of replying to job advertisements and/or sharing one's *curriculum vitae*.

**AL-KO Vehicle Technology Electronics S.r.l.**, for the above-mentioned purposes, may ask candidates to provide any useful data for the assessment of their suitability to fill the professional positions for which the search is carried out.

#### 1. DATA CONTROLLER

The Data Controller (i.e. the entity that determines the purposes and means of the processing of personal data) is **AL-KO Vehicle Technology Electronics S.r.l.**, with registered office in Via Vienna, 4 - 38121 Trento - Italy, tel. +39 0461 991 598, e-mail [cbe@cbe.it](mailto:cbe@cbe.it); [info@nordelettronica.it](mailto:info@nordelettronica.it) For contacts specifically related to the protection of personal data, including the exercise of the rights referred to in paragraph 8 below, we indicate in particular the e-mail address: [privacy@alko-tech.com](mailto:privacy@alko-tech.com) to which you are kindly requested to send any requests.

#### 2. PURPOSE OF PROCESSING TYPE OF DATA PROCESSED, CONSEQUENCES OF FAILURE TO PROVIDE DATA, LEGAL BASIS OF DATA PROCESSING

The purpose of the processing is to **select the figures to be included in the workforce and assess that they are in line with the Controller's needs**. To this end, the Data Controller may ask candidates to enter their *curriculum vitae* and any other necessary information on the website. Candidates, for the same purposes, may enter their *curriculum vitae* on their own initiative on the website.

Please include in your CV only information relevant to the purpose of selection. In particular, please limit health-related information to what is strictly necessary to inform the potential employer of your membership of protected categories.

The provision of the requested data is optional. However, failure to provide the data will not allow the interested party to reply to the Controller's advertisements, or to submit a spontaneous application and thus take part in the personnel selection process set up by the Controller.

The processing of data finds its legal basis in the fact that it is necessary in order to carry out pre-contractual measures within the framework of the selection procedure to which the data subject has adhered or has promoted by spontaneously sending a curriculum vitae.

In the case of data falling into the special categories referred to in Article 9 of the Regulation prior to the establishment of the employment relationship (i.e. personal data revealing racial or ethnic origin, political opinions, philosophical or religious beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning the health or sex life or sexual orientation of the person), the explicit consent of the Data Subject is required, which he/she may express at the first interview with the Data Controller.

#### 3. PROCESSING METHODS AND STORAGE PERIOD

The processing will be carried out:

- through the use of manual and automated systems;
- by persons or categories of persons authorized to perform the relevant tasks;
- with the use of appropriate measures to guarantee the confidentiality of the data and prevent access to them by unauthorized third parties.

The storage of data following the possible establishment of an employment relationship will follow the fate of the personnel file and therefore for the entire duration of the relationship and, upon its termination, for a period no longer than is necessary to fulfil the obligations or tasks connected with the relationship, with gradual deletion of data attributable to specific needs that are no longer pursued. In any case, full information on the processing of employee data will be provided at the time of employment.

In the event that the selection procedure does not lead to employment, the processing will cease once this decision has been taken, and in any case within 6 months of sending the curriculum vitae, unless the candidate - at the request of the Controller in particular cases - consents to processing for a longer period.

There are no automated decision-making processes.

#### 4. RECIPIENTS OF DATA

In addition to the subjects belonging to the Controller's corporate organizational structure (e.g. employees and collaborators), authorized according to the relevance of their functions with the relevant processing operations, the data collected and processed may be accessed, under the conditions set by the Controller and in their role as Data Processors, by subjects carrying out IT services, including those relating to backup and cloud storage.

An up-to-date list of the persons designated as Data Processors pursuant to Article 28 GDPR can be obtained from the data controller's contact details listed above.

Prior to the conclusion of the contract, the Interested Party may be subjected to a medical examination to verify suitability for the duties, in which case the personal data may be communicated to the doctor in charge.

The data will not be disseminated.

#### 5. PLACE OF DATA PROCESSING

Data processing takes place on the territory of the European Union.

#### 6. RIGHTS OF THE DATA SUBJECT

The GDPR grants the Data Subject the exercise of the following rights with regard to personal data concerning him/her (the summary description is indicative, for the full statement of rights, please refer to the Regulation, and in particular Articles 15-22):

**Right of access** (Art. 15 of the Regulation): confirmation as to whether or not personal data relating to him are being processed and, if so, the right to obtain, inter alia, access to those data and to information concerning the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the data have been or will be disclosed.

**Right of rectification** (Art. 16 of the Regulation): (i) rectification of inaccurate personal data concerning him/her without undue delay and (ii) integration of personal data, if incomplete.

**Right to erasure ('right to be forgotten')** (Art. 17 of the Regulation): deletion of personal data concerning him/her without undue delay (the Data Controller is obliged to erase personal data without undue delay in the cases provided for in Article 17 of the Regulation).

**Right of restriction of processing** (Art. 18 of the Regulation): in certain cases -contesting the accuracy of the data, during the time necessary for verification; contesting the lawfulness of processing with opposition to deletion; need for use for the data subject's rights of defense, while they are no longer useful for processing purposes if there is an objection to the processing, while the necessary verifications are carried out - the data will be retained in such a way as to be eventually restored, but, in the meantime, they will not be available for consultation by the Controller except in connection with the verification of the validity of the request for restriction made by the Data Subject, or with the consent of the Data Subject or for the establishment, exercise or defense of legal claims in court or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

**Right to data portability** (Art. 20 of the Regulation): where the processing is based on consent or on a contract and is carried out by automated means, at his or her request, the Data Subject shall receive in a structured, commonly used and machine-readable format the personal data concerning him or her and may transmit them to another Data Controller, without hindrance from the Data Controller to whom he or she provided them and, if technically feasible, he or she may obtain that such transmission be carried out directly by the latter.

**Right of objection for processing carried out pursuant to Article 6(1)(e) or (f)** (Art. 21 of the Regulation): in whole or in part, on grounds relating to the particular situation of the Data Subject, to processing carried out on the basis of a legitimate interest.

Where processing is carried out on the basis of consent given by the data subject, i.e. for processing covered by this information notice with regard to particular data and, where applicable, consent to processing for periods of more than six months, the data subject may **revoke his or her consent** at any time, without prejudice to the lawfulness of the processing given prior to revocation.

The Data Subject also has the right to lodge **a complaint with the Garante per la Protezione dei dati personali** if he/she considers that the processing that concerns him/her violates the provisions of the Regulation; the Garante per la protezione dei dati personali can be contacted via the contact details indicated on the Authority's website [www.garanteprivacy.it](http://www.garanteprivacy.it). In any case, we would like to have the opportunity to address in advance any doubts of the Data Subjects, who may contact the e-mail address [privacy@alko-tech.com](mailto:privacy@alko-tech.com) or the other contact details of the Data Controller indicated above for any clarification concerning the processing of their personal data and for the exercise of their rights.

Only in the case of data collection of a special nature pursuant to Article 9 of the GDPR

I hereby declare that I have read the Information on the Processing of Personal Data and give my consent to the processing of data of a special nature.

Signature \_\_\_\_\_