

Dear Sir/Madam

This information is provided pursuant to and for the purposes of Articles 12, 13 and 14 of EU Regulation 2016/679 on the protection of personal data ("GDPR") by Turboden S.p.A. in its capacity as data controller.

We remind you that the aforementioned Regulation lays down a number of obligations for those who carry out "processing" (i.e. any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring storing, adapting or modifying, extracting, consulting, using, communicating by transmission, disseminating or otherwise making available, comparing or interconnecting, limiting, erasing or destroying) personal data of the persons to whom the data relate (so-called "data subjects"). For the purposes of this information, you identify yourself as a data subject.

Identity of the data controller

The Data Controller of your personal data is TURBODEN S.p.A., in the person of its pro tempore legal representative, with registered office in via Cernaia 10- 25124 Brescia.

Data source

The personal data processed were acquired in response to an advertisement or in the case of voluntary self-application:

- Directly by you, upon submission of your CV, motivation letter and the like or by filling in the *online form* available on the Controller's website;
- With third parties (e.g. *LinkedIn* or *recruiting* companies that the Data Controller may use for the purpose of research and selection of personnel) by means of a curriculum vitae, motivational letter, summary report on your profile;
- Directly from you during assessment interviews and pre-employment agreements.
- Data relating to the development and conclusion of the recruitment process in relation to the job research in which you participate.

Data processed

The common personal data collected and processed by TURBODEN S.p.A. mainly fall into the following categories:

- identification data (in particular: name, surname, address, telephone number, tax code, age, sex, place and date of birth, picture);
- personal data relating to education and work (in particular: curriculum vitae and work history, educational qualification, internship or professional training, professional skills, salaries, salary supplements and deductions, any company assets allocated to the employee as benefits or other).

Furthermore, in particular cases and always due to the employment relationship being established, the Data Controller may become aware not only of common data, but also of special data pursuant to Article 9 GDPR 679/16, the so-called "sensitive" data, insofar as they are capable of revealing, for example, the state of health (e.g. certificates of enrolment in protected categories).

Unless strictly necessary for the purposes of your application and for the purposes set out below, we ask you not to transmit any unnecessary information, especially if it belongs to the special categories referred to in Article 9 GDPR; otherwise, should you decide to provide it, the Controller will not use/process it.

Methods of data processing

Your data will be processed using manual and/or electronic systems, only partially automated, suitable for storing, managing and transmitting the data, with logic strictly related to the purposes indicated below, based on the data in the possession of the Data Controller, and with your commitment to promptly communicate any corrections, additions and/or updates.

The Data Controller may carry out the processing by means of authorised internal staff or by entrusting third parties with the processing operations.

The Data Controller will carry out processing in compliance with the provisions on the protection of personal data and with the principles of transparency and impartiality, guaranteeing the security, confidentiality and protection of the personal data in its possession, at any stage of the process.

Purpose of processing

Your personal data will be processed for the following purposes:

- assess the consistency of your profile with respect to the job positions open at Turboden and, in general, make all appropriate evaluations regarding the possibility of establishing a working relationship or collaboration between you and Turboden;
- manage selection process for collaborators and employees in compliance with the relevant company procedures;
- contact you at the contact details you have provided in order to schedule any necessary interviews;
- performance of any pre-contractual obligations and agreements that may be of interest to you.

Legal basis of processing

Your common personal data are lawfully processed on the basis of Article 6(1)(b) of the GDPR, i.e. for the purposes of the performance of a contract to which you, as data subject, are a party or the performance of pre-contractual measures taken at your request, as well as on the basis of art. 6(1)(f) of the legitimate interest of the Data Controller to evaluate possible candidates with a view to their inclusion in the workforce and to document the process in accordance with company procedures.

The processing of any special categories of data strictly necessary for the purposes set out will take place in accordance with Article 9(2)(b) of the GDPR, i.e. in order to fulfil the obligations and exercise the specific rights of the data controller or the data subject in the field of labour law and social security and social protection, in light of the Decision of the Italian Data Protection Authority No. 146 of 5 June 2019, taking into account the purposes of establishing the employment relationship.

Within the limits of the above purposes, consent to the processing of personal data in curricula collected from the person concerned in the pre-contractual phase is not required.

Communication and recipients of data

Your personal data is not disseminated, i.e. it is not disclosed to unspecified persons, in any possible form, including making it available or simply consulting it.

On the other hand, the data may be communicated to internal subjects or third parties (e.g. intermediary companies), for reasons functional to the pursuit of the purposes above. Moreover, the data may be accessible, for limited purposes of maintenance of the Controller's systems, to internal or external subjects appointed for this purpose. The subjects operating under the authority of the Data Controller have been appropriately authorised on the basis of the type of service provided, the processing carried out and the nature of the data processed.

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Subject: Informativa ai candidati ai sensi degli articoli 12, 13 e 14 del Regolamento Europeo 2016/679 (GDPR)

Data transfer abroad

Your personal data may also be communicated or transferred abroad, including to companies in the Data Controller's group, within the European Union or to non-EU countries for which there is a Commission adequacy decision or to parties with which appropriate safeguards have been adopted, such as standard data protection contractual clauses, in accordance with applicable law and in particular Articles 45 and 46 of the GDPR.

Period of data retention

The Data Controller shall retain the personal data for the time necessary to fulfill the purposes indicated, in any case for no longer than thirty-six (36) months from collection, unless an employment relationship is established with the Data Controller and unless you agree to extend the retention period. Thereafter, the Data Controller may retain data that must be kept for longer periods to comply with legal obligations or for protection in the event of litigation or legal action. It is understood that should the selection process be successful, your personal data will be processed by Turboden according to the modalities indicated in the privacy policy statement prepared for Turboden's employees and collaborators, which will be delivered to you in due course.

Withdrawal of consent

With reference to Article 7 of GDPR 679/16, you, as a data subject, may revoke any consent you have given at any time.

It should be noted, however, that the processing referred to in this notice is lawful and permitted even in the absence of consent, as specified above.

Lodging of complaints

We remind you that you always have the right to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), pursuant to Article 77 of the GDPR, if you believe that the processing of your data is contrary to the legislation in force.

Refusal to provide data

The provision of your personal data for the above purposes is absolutely optional, but failure to provide such data will make it impossible to proceed with the verification of the prerequisites for recruitment and/or the start of collaboration and, therefore, the possible establishment of a relationship with the Controller.

Automated decision-making processes

The Data Controller does not carry out processing operations consisting of automated decision-making processes.

Rights of the data subject

The data subject's rights are specified in Articles 15- right of access, 16- right of rectification, 17- right to erasure, 18- right to restriction of processing, 20 - right to portability, 21- right to object, 22 right to object to automated decision making of the GDPR 679/16. You, as a data subject, may exercise these rights by writing to the Data Controller TURBODEN S.p.A at the above address, also by email (privacy@turboden.it), specifying the subject of the request, the right you intend to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request.

The full text of Articles 15 to 22 of EU Regulation 2016/679 is available at the Data Controller's premises and also at www.garanteprivacy.it.

We would like to inform you that, for any clarification on these matters, including in the event of uncertainty about the nature of a piece of data and the behaviour to be adopted for its processing, or for further information on

your rights, you may contact the Data Controller by writing to privacy@turboden.it.

Reports and communications

Any report or communication concerning the processing of your data may be sent directly to the Data Controller, Turboden S.p.A., or to the person to whom the Data Controller has delegated responsibility for processing concerning workers, the HR Manager, at the following email address: privacy@turboden.it or by post to the following address: Via Cernaia 10, 25124 Brescia, Italy, for the attention of the HR Manager.

TURBODEN S.p.A.