

Dear Ms/Mr,

this information is provided, pursuant to Articles 12, 13 and 14 of EU Regulation 2016/679 on the protection of personal data ("GDPR") by Turboden S.p.A. as the owner of the processing of data concerning you.

#### 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 Protection Officer (DPO)

The DPO can be contacted by e-mail at [dpo@turboden.it](mailto:dpo@turboden.it)

#### Data source

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

- directly from you, upon sending your CV, motivational letter and the like or filling in the online form available on the Controller's website;
- by third parties (e.g. LinkedIn or recruiting companies that the Data Controller may use for the purpose of recruitment and selection) by means of your CV, motivational letter, summary report on your profile;
- directly from you during assessment interviews and pre-employment agreements.

#### Data processed

The common personal data collected and processed by TURBODEN S.p.A. can be divided into the following categories:

- Identification data (in particular: name, surname, address, telephone number, tax code, age, sex, place and date of birth, image);
- 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 assigned to the employee as benefits or other);
- any references;
- data relating to assessments connected with the selection process in which you are involved.

In addition, in special 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 (art. 9 GDPR 2016/679), so-called "sensitive" data, insofar as they may reveal, for example, your state of health (e.g. certificates of enrolment in protected categories, level of disability, etc.).

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 Data Controller will not use or process it in any way.

#### Methods of data processing

Your data will be processed using manual and/or electronic systems, only partially automated, suitable for storing, managing, storing and transmitting the data itself, 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.

In particular, in the process of data acquisition, processing and storage, Turboden S.p.A. will use the SAP Success Factors system, whose servers are located in the EU (Germany).

#### Purpose of processing

The data concerning you will be processed for the following purposes:

1. assessment of the consistency of your profile with respect to the job positions open at Turboden and, in general, to make all appropriate assessments regarding the possibility of establishing a working relationship or collaboration between you and Turboden;
2. manage the selection processes in compliance with company procedures;
3. contact you at the contact details you have provided in order to schedule any interviews that may be necessary and in order to contact you again for any future positions;
4. to carry out any pre-contractual obligations and agreements that may be of interest to you.

#### Legal basis of processing

Your common personal data are lawfully processed for the above purposes:

- for the purpose of the performance of a contract to which you, as data subject, are party or the performance of pre-contractual measures taken at your request Art. 6 (1)(b) of the GDPR;
- on the basis of the legitimate interest of the Controller to document the process in accordance with the business procedures of Art. 6 (1)(f) of the GDPR;
- your explicit consent to the longer retention of data.

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. 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.

#### Communication and recipients of data

Your personal data are not disclosed, i.e. they are not given to unspecified parties, in any possible form, including making them available or simply consulting them.

They may instead be processed by:

- employees or collaborators who operate under the authority of the Controller and have been authorised and trained (e.g. HR employees, ICT employees, company managers)

- Data Processors, to whom the Data Controller has entrusted all or part of the processing of your data by virtue of a service contract for reasons functional to the pursuit of the purposes set out (e.g. software assistance and maintenance companies, specialised companies in charge of personnel selection, service provider of the recruiting platform);

In addition, the data may be shared with the other companies of the group in order to evaluate your candidacy in the MHI Group, in case of announcements that concern opportunities for employment in other MHI companies. In particular, with regard to the implementation of the Success Factors Platform, Mitsubishi Heavy Industries Europe (MHIE) has been designated as the platform provider and MHI Shared Services Americas (MSSA) has been designated as the service and maintenance provider.

#### Data transfer abroad

Your personal data may be communicated or transferred to third countries outside the EU and to international organisations. In particular, data will be transferred to MHI Group Companies or Service providers of platforms and software for managing job applications, on the basis of an adequacy decision by the Commission (art. 45 GDPR) or appropriate safeguards, such as standard data protection contract clauses (SCCs) in agreements and contracts entered into, in accordance with applicable law (46 GDPR).

Upon request of the data subject, the Controller will make available the necessary documentation regarding the safeguards adopted.

#### Period of data retention

The Data Controller shall keep the personal data for the time necessary to fulfil the purposes indicated, in any case for no longer than 24 months from the closure of the selection process.

The data controller may retain the data for a longer period of time in order to ensure the protection of its interests in the event of an ongoing dispute or in the event that the candidate renews his/her application on the platform.

It is understood that if the selection process is successful, your personal data will be processed according to the methods indicated in the privacy policy for Turboden employees and collaborators, which will be delivered to you in due course.

#### Withdrawal of consent

With reference to Article 7 of the GDPR 2016/679, you may at any time withdraw the consent you gave to the prolonged storage of your personal data for further 24 months. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### Complaints

We would like to 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 art. 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 purposes set out above is optional, but failure to provide such data will make it impossible to assess your candidature and proceed with the selection process and, therefore, to verify the prerequisites for the possible establishment of the working relationship with the Owner.

#### Automated decision-making processes

The Data Controller does not carry out, as part of the recruitment and selection process, processing operations consisting of automated decision-making processes.

#### Rights of the interested party

You, as a data subject, may exercise your rights under Articles 15-22 GDPR. In particular, you may request access to the data concerning you, their deletion, the rectification of inaccurate data, the integration of incomplete data, the limitation of processing in the cases provided for by art. 18, the right to portability of your data, and exercise the right to object to processing under the conditions provided for by art. 21 GDPR. Furthermore, in accordance with art. 7, you may revoke your consent to the prolonged storage of your personal data in the archives of the Data Controller.

You may exercise these rights by writing to Turboden S.p.A. at the above address and by e-mail ([privacy@turboden.it](mailto:privacy@turboden.it)), specifying the subject of the request, the right you intend to exercise and providing any element suitable for its identification (including a photocopy of an identity document) certifying 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 offices and also on the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

We inform you that, for any clarification regarding the content of this information notice, or for further information on your rights, you may contact the Data Controller, by writing at [privacy@turboden.it](mailto:privacy@turboden.it).

#### Turboden S.p.A.