

	<b>PRIVACY POLICY FOR APPLICANTS</b> ("Privacy Policy")	Versione:	<b>001</b>
		Data:	<b>June 2023</b>
		Prepared by:	<b>Gianluca Passuti</b>
		Approved by:	<b>President of the Board of Directors</b>

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### 1. General provisions

**1.1. Introduction.** O.M.P. Officine Mazzocco Pagnoni S.r.l. ("Company") is committed to protecting personal data according to (i) the Regulation (EU) 2016/679 ("GDPR") *on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC* as well as (ii) the applicable Italian legislation on personal data protection ("National Data Protection Laws").

**1.2. Purpose of the Privacy Policy.** This Privacy Policy establishes how the Company processes personal data and information provided by applicants by sending their *curriculum vitae* and by virtue of subsequent interviews (if any) for a potential employment at or collaboration with the Company ("Applicants").

**1.3. Role of the Company.** The Company processes Applicants' personal data as a data controller. The identity and contact details of the Company appear in the Company's letterhead and in any case are available on the Company's website.

**1.4. Updates and revisions.** The Company reserves the right to amend and/or update the Privacy Policy, also as a result of new legislative measures or revised provisions of any National Data Protection Laws and/or the GDPR and/or EU laws and regulations on personal data protection. For this reason, the Privacy Policy shall be marked with progressive identification numbers and month of publication, starting from the version of May 2018, identified by the number "00". Any new version of the Privacy Policy shall be released as a replacement of the previous versions and shall be valid and applicable from the date of communication to Applicants.

**1.5. Applicable rules.** The Company carries out processing activities in accordance with (i) provisions of National Data Protection Laws; (ii) provisions of the GDPR, as directly applicable; (iii) guidelines and decisions issued by the Italian Data Protection Authority ("Data Protection Authority").

### 2. Data subjects and scope of application

**2.1. Subjects affected by the Privacy Policy.** The Privacy Policy is addressed to Applicants, who provide their personal data, using the following methods:

- a. by handing their *curriculum vitae* and cover letters ("Documents") in printed form directly to the Company personnel who is authorised to receive such Documents, or by sending the letters by mail to the registered office address of the Company;
- b. by uploading the Documents to the "Careers" section of the Company website [www.omppumps.com](http://www.omppumps.com) ("Website") as a spontaneous application or in response to a job posting for an open position at the Company;
- c. by voluntarily sending the Documents via e-mail to the contact information of the Company, listed on the Website;

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- d. by handing or sending the Documents to third parties (e.g., recruiting and head-hunting companies/agencies/platforms, temporary work agencies, etc.), that may be employed by the Company for personnel recruitment and selection activities.

**2.2. Scope of application.** The Privacy Policy is applicable to processing operations run by the Company for the purpose of carrying out activities related to Applicants' assessment and selection.

### 3. Nature, types and source of processed data

**3.1. Processed personal data.** The Company processes Applicants' personal data, which consists in common data – which does not fall within the definition of sensitive and/or judicial data as set forth in the National Data Protection Laws, nor within the special categories of personal data as set forth in the GDPR, nor within the definition of health data (hereinafter jointly referred to as "Particular Data") – with the exception of some Particular Data, which might be requested from or provided by the Applicant and/or which the Company is required to know in view of the employment relationship that could be established: in particular, being a member of protected categories or any pre-employment medical assessments. With specific regard to Particular Data, which could be processed by the Company, it is hereby specified that said category of personal data may include: (i) strictly necessary data, related to the execution of those work activities, which subject to the selection procedure and/or (ii) data constituting an essential requirement for work purposes. Applicants are therefore asked not to provide Particular Data, in case said data is not strictly connected to the abovementioned cases and in any case to give their specific consent to the processing of said data (if any).

**3.2. Source of processed personal data.** Personal data, including Particular Data, is contained in Applicants' Documents – provided to the Company in accordance to the methods listed in the previous paragraph 2.1. – or it is provided to the Company by the Applicants themselves in the course of possible subsequent interviews, aimed at assessing the skills and necessary conditions for a potential recruitment or working relationship with the Company.

### 4. Purposes of the processing, legal basis and period of data retention

**4.1. Purposes, legal basis and data retention period.** The Company processes Applicants' personal data, including Particular Data, for the following purposes, as specified in the table hereinbelow ("Table"), in which it is furthermore highlighted (a) the relevant legal basis and (b), with regard to data subjects' consent, if an express consent to processing is needed (or not), as well as (c) the data retention period:

	<b>Purposes</b>	<b>Legal basis</b>	<b>Consent</b>	<b>Data retention period</b>
<b>A</b>	Collect and analyse personal data contained in Applicants' Documents, which are sent/delivered directly to the Company, in order to assess the skills and qualifications with a	This processing is essential for taking the relevant pre-contractual steps (i.e., the verification of the Data contained in the Documents), at the request of the Applicants, meaning at the	Not required	Documents are retained for the period of time necessary to make assessments and in any case for a period of time not exceeding one year from the date of receipt of the same; upon expiry of this period, Documents received shall be



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	view to organizing an interview.	transmission/delivery of the Documents.		destroyed, unless (i) they may be of interest with regard to an ongoing recruitment and selection or (ii) in case, at the end of the selection procedure, an employment/collaboration agreement is concluded with the Company; under these conditions, the Applicant’s personal data shall be retained in the respective files, according to the data retention period set out in the Privacy Policy for employees.
<b>B</b>	Collect and analyse personal data contained in Applicants’ Documents made available by the same to third parties (for instance, recruitment agencies) which may be employed by the Company in order to assess the skills and qualifications with a view to organizing an interview.	This processing is based on the Company’s legitimate interest to perform activities aimed at recruiting and selecting people to fill vacancies.	not required	Documents are retained for the period of time necessary to make assessments and in any case for a period of time not exceeding one year from the date of receipt of the same; subsequently, Documents received shall be destroyed, unless (i) they may be of interest with regard to an ongoing recruitment and selection or (ii) in case at the end of the selection procedure an employment/collaboration agreement is concluded with the Company; under these conditions, the Applicant’s personal data shall be retained in the respective files, according to the data retention period set out in the Privacy Policy for employees.
<b>C</b>	Collect and analyse personal data (including Particular Data, subject to the limits contained in article 3.1) provided by Applicants even in the course of interviews, with a view to interviewing/assessing Applicants and	This processing is essential for taking the relevant pre-contractual steps (i.e., the verification of personal Data provided by Applicants during the process of recruitment and selection) at the request of the	not required	Personal data provided by Applicants even in the course of interviews is retained, together with Documents forwarded or delivered to the Company, for the same data retention period as specified above with regard to the purpose indicated sub A).



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inserting them in the Company's recruiting process for a potential employment at or collaboration with the Company.	Applicants. With specific regard to Particular Data (if any) provided by Applicants, this processing is necessary to fulfil obligations and exercise rights according to article 9.1 letter b) of the GDPR and it is especially necessary to fulfil the obligations imposed by the specific sectorial legislation, as well as in compliance with article 111- <i>bis</i> of the Legislative Decree n. 196/2003 and with the general authorisation from the Data Protection Authority, contained in the Regulation n. 146/2019.		
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**4.2. Optional/mandatory supply of data.** After the submission of the Documents, the provision of personal data by Applicants during subsequent interviews (if any) with persons in charge of the Company is optional. However, Applicants' partial or total failure to provide personal data, including Particular Data, which is necessary to assess skills and qualifications required with regard to the working position wanted, will prevent the Company from carrying out all necessary and instrumental activities related to the possible establishment of the employment/collaboration relationship with the Company itself.

### 5. Persons in charge of the processing and processors

**5.1. Controller and persons in charge of the processing.** The Company is the controller of Applicants' personal data, in charge of carrying out the processing activities as specified in the Table. Directors, shareholders, managers, employees and independent collaborators of the Company (independently from the contractual relationship concerned) may process Applicants' personal data in their capacity as persons in charge of processing, according to National data Protection Laws and to article 29 of the GDPR.

**5.2. Processors.** The Company may designate as processors external entities/individuals, including, but not limited to, professional advisers and service providers, entitled to process personal data on behalf of the Company for specific purposes. The complete list of processors (if any) of personal data covered by this Privacy Policy may be required by Applicants by sending (i) a written notice, even via email, to the Company's HR Department to the following address [privacy@omppumps.com](mailto:privacy@omppumps.com) or (ii) any written notice, even via email, to the address and contact

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details listed on the Website and on the Company's letterhead. According to the GDPR, the Company is not obliged to designate a data protection officer.

**5.3. Limitations.** Persons in charge of processing activities as well as processors (if any) are duly trained and are in possession of specific qualifications, allowing them access to Applicants' personal data, including Particular Data, in accordance with the specific duties and tasks assigned to them (even by virtue of a contractual relation, for instance, in the event of a contractual relation with a processor, according to article 28.3 of the GDPR) and in compliance with the Privacy Policy.

## 6. Method and place of processing

**6.1. Method of processing.** Personal data covered by this Privacy Policy is processed almost exclusively through automated procedures, using computer systems, or in other cases through manual means; in any case, through methods which are strictly related to the purposes for which such data is collected and always to ensure its protection, in accordance with the GDPR and the National Data Protection Laws.

**6.2. Place of automated data processing.** Processing of personal data covered by this Privacy Policy is carried out in part in the head-offices of the Company and stored on the Company's servers and partly on the servers of processors appointed by the Company to manage the recruitment and selection activities.

**6.3. Place of manual data processing.** When Applicants' personal data is collected offline (e.g., on paper) all relevant documents (including *curriculum vitae* and cover letters) where said data is contained is stored in the head offices of the Company, or of the processors and service providers (where appointed), and inserted in appropriate archives, locked and accessible only to duly authorized personnel.

**6.4. Dissemination and communication.** Applicants' personal data will not be divulged. Applicants' personal data may be communicated to external processors and/or service providers identified and appointed according to article 28 of the GDPR.

## 7. Applicants' rights

**7.1. Rights.** Applicants may directly contact the data controller or the data processor/s appointed by the controller (if any), in order to enforce their rights under the National Data Protection Laws and the GDPR (articles 15 et seq.) and, in particular, to access their own personal data, and request for it to be amended, updated or erased, as well as ask for restrictions of processing, and obtain data portability by sending a communication as follows (i) via e-mail to the address [privacy@omppumps.com](mailto:privacy@omppumps.com) or (ii) through any other mean to the address and contact details listed on the Website and on the Company's letterhead or to the e-mail address of the Company's HR Department: [job@omppumps.com](mailto:job@omppumps.com)

**7.2. Right to object.** With the same procedures defined in the previous paragraph, Applicants may object, in part or in total, to the processing of the personal data that concerns them, where the relevant legal basis is constituted by the legitimate interest of the Company, pursuant to and for the purposes of the provisions of article 21 of the GDPR.

**7.3. Complaint.** Without prejudice to the above, any Applicant who believes that the processing of data concerning him or her is in violation of the GDPR, in accordance with article 77 of the GDPR, may lodge a complaint with the Data Protection Authority (provided that – as per article

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77 of the GDPR – such a supervisory authority is based in the Country where the Applicant usually lives or works) or with a supervisory authority where the alleged violation has occurred.

**7.4. *Withdrawal of consent.*** In case it is required that Applicants give their consent for certain processing activities, they have the right to withdraw their consent at any time – without prejudice to the obligations provided for by the regulations in force at the moment of the withdrawal request - by sending a written notice to the Company at the address and contact details listed on the Website and on the Company’s letterhead or to the aforementioned contact details of the Company’s HR Department, which shall perform all necessary and subsequent activities with regard to the withdrawal of consent, which will not compromise the legitimacy of the processing based upon consent, before the withdrawal request.

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