

PRIVACY NOTICE

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

INTRODUCTION

Teoresi GmbH, in accordance with the applicable legislation, undertakes to process the data concerning you in accordance with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 "on the protection of natural persons with regard to the processing of personal data" ("GDPR").

Teoresi GmbH invites you to read the following information notice drawn up pursuant to Articles 13 and 14 GDPR. This notice is addressed to all those who are engaged in a professional activity and/or service in favour of Teoresi ("Data Subjects").

DATA CONTROLLER

The Data controller of your Data processing is Teoresi GmbH, with registered office in in Brienner Straße 55, 80333 Munich (DE), VAT no. (USt-Id.Nr.): DE315879756.

The Data Controller can be reached at the following e-mail: privacy@teoresigroup.com.

CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING

The Data Controller will process your personal data collected during the establishment and the execution of the employment contractual relationship. The following data may be processed:

- a) Personal data, such as: first name, last name, tax code, residential address and telephone number, place and date of birth, e-mail address (meaning common identification and contact data), residence permit (if any), logs, IP address, entrance and exit time, curriculum vitae, performance data, disciplinary measures, professional training data.
Personal data will be processed for the execution and management of the employment contract between the company and the employee and for the fulfilment of legal obligations the Data Controller is subject to.
- b) "Special" categories of personal data, as per art. 9 of the GDPR, namely health data (limited to protected categories belonging) and trade union membership.
The processing of "special" data will be carried out only if strictly necessary to fulfil the obligations with regard to labour law, social security and social protection (e.g. the right to benefits provided for by law or by the future labour contract; the right to obtain work permits and expectations for political or trade union offices, etc.).
- c) "Judicial" information relating to criminal convictions and offences or related security measures.
The processing of "judicial" information will take place exclusively within the limits of what is necessary for the implementation of the obligations relating to the specific function of the employee and those provided for by the anti-mafia and anti-money laundering regulations, to comply with the ISO/IEC 27001 standard (so-called computer crimes) or in case a specific authorization is demanded by security public authorities according to Article 6, paragraph 1, letter c) of the GDPR ("*processing is necessary for compliance with a legal obligation to which the controller is subject*").
- d) tax data and income status
- e) banking and salary data

The processing of personal data referred to in points d) and e) will be carried out for the purposes of the execution of the employment contract the data subject is party to and of the fulfilment of a legal obligation the Data Controller is subject to.

f) Pictures and/or videos

Such data processing will be aimed at identifying the employee within the company organization. The legal basis for the processing is the legitimate interest of the Data Controller.

Pictures and/or videos may also be taken for institutional, public relations and informational purposes related to corporate activities. In such cases, an authorisation for the processing of the Data Subject's data is necessary. When the authorization is acquired, all the necessary information relating to the processing at issue will be provided. The legal basis is therefore the consent of the Data Subjects. The provision of Personal Data is optional. If you do not wish to appear in any pictures and/or videos, we invite you to stay outside the shooting area.

PURPOSES OF THE PROCESSING

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

- management of the existing contractual relationship,
- preparation, management and payment of remuneration, social security contributions and social assistance charges relating to the existing employment relationship,
- drafting, updating and storage of all books and documents required by labour law,
- correct use of the company's IT tools in order to minimise the risk of unauthorised access and the introduction of viruses, as well as to verify the identity of authorised parties when accessing IT tools,
- fulfilment of all contractual (including the collective ones) and legal obligations concerning labour law, health and safety in the workplace,
- satisfying operational, organisational, managerial, fiscal, financial, insurance and accounting requirements relating to the established contractual relationship,
- managing access at customer locations or sites,
- organization of travel and business trips,
- any request for special permits or authorisations (e.g. Security Clearance),
- fulfilment of any other obligation required by the law, regulations, or European Community legislation.

The provision of your personal Data is necessary for the correct establishment and execution of the employment relationship and to allow the Data Controller to fulfil the related legal obligations. Any refusal to provide the aforementioned Data will make impossible for the Data Controller to enter any working relationship with you or to execute it properly.

In order to pursue the above organizational, contractual, administrative purposes, arising from legal obligations, the Data Controller may collect and process personal data relating to your family members (e.g. granting family allowances).

NATURE OF DATA PROVISION

The provision of your personal data, and likely the personal data of your family members, is necessary for the abovementioned purposes, in the light of the legal and contractual obligations the Data Controller is to be compliant with, in order to correctly begin the employment relationship and ensure the proper management and continuation

thereof. Failure to provide, in whole or in part, such Personal Data, will make it impossible for the Data Controller to establish with you any employment relationship or to guarantee the proper execution thereof.

The purposes relating to pictures and/or video recordings, for which the consent of the Data Subject is required, make an exception to the mandatory character of the processing, as the latter is optional in nature. This applies without prejudice for the lawful exercise of the right to object at any time to the processing concerned.

PROCESSING METHODS

Data will be processed and collected through paper-based instruments, computer and telematic media, suitable for ensuring the security and confidentiality of the data, in accordance with the provisions of art. 32) of the European Privacy Regulation UE/2016/679 (GDPR).

However, by carrying out the processing operations the minimum level of data protection required by law is guaranteed by adopting all the technical, computer, organizational, logistical and procedural security measures.

Your Data will be processed only by personnel expressly authorized by the Data Controller.

DATA RECIPIENTS

Data will be included in the records and registers required by law and will be transmitted to social security institutes, financial offices and Public Administrations, where required in compliance with the law.

Your Personal Identifying Data may also be shared by the Company with the following subjects:

- all persons to whom the right of access to such data is recognized by law,
- our collaborators, employees in charge of data processing, as part of their duties,
- all those physical and/or legal, public and/or private persons when the communication is necessary or functional to the constitution and management of the working relationship, in the ways and for the purposes illustrated above (e.g. companies or professional firms that provide assistance and advisory services to the Company in the payroll and contributions processing sector),
- customers and/or suppliers only to achieve the purposes related to the performance of functional activities with respect to the company's business (e.g. to allow access to their premises),
- Other Group Companies (please see art. 7 below).

DATA PROCESSOR

Your personal data may be disclosed to the other companies of Teoresi Group based both in Europe - Italy and Germany - and in third countries - United States of America and Switzerland -, which, by virtue of intra-group agreements act as Data Processors. In any case, all the guarantees required by the GDPR for the protection of personal data will always be applied.

DATA RETENTION PERIOD

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be kept for the time necessary to achieve the purposes pursued, pursuant to art. 5 of the GDPR and in connection with the employment relationship. In any case, the retention period of your personal data will not exceed 10 years in compliance with the obligations relating to the holding of accounting records from the last recording data and in any case for the time necessary for the legal protection of the Data Controller.

RIGHTS OF DATA SUBJECT

As a data subject, you may exercise the rights provided for by article 15 et seq. GDPR against Teoresi, by sending an e-mail to the following address: privacy@teoresigroup.com . Your request will be processed within 28 days by the Data Controller.