

Information Notice for Candidates on Personal Data Processing

Pursuant to Art. 13 of Italian Law Decree no. 196/03 (hereinafter referred to as “Data Protection Code”) and pursuant to Articles 13 and 14 of Regulation 2016/679/EU (hereinafter referred to as “GDPR”) Costruzioni Meccaniche Luigi Bandera S.p.A. (hereinafter referred to as “Data Controller”) having its registered office at no. 120 Corso Sempione - 21052 Busto Arsizio (VA), acting as “Data Controller”, hereby informs you that your personal data, collected for the purpose of **personnel selection and recruitment** (as employee, contractor, intern, apprentice, etc.) for Costruzioni Meccaniche Luigi Bandera S.p.A. shall be processed in full compliance with applicable regulation in force, ensuring your essential rights and freedoms.

Origin and type of processed data

Your personal data, which, in general, are directly supplied by you (via e-mail, in hard copy, by completing the dedicated form available on the company website, etc.), but may also be supplied by Third Parties who have been entrusted with personnel selection and recruitment (head-hunting companies, websites specialised in personnel selection and recruitment, etc.), shall be processed by Costruzioni Meccaniche Luigi Bandera S.p.A. to select potential candidates with whom establish a collaboration in the forms and modalities determined from time to time, in compliance with obligations under applicable law provisions. The aforementioned data processing shall involve:

- a) Personal details, reference details, data related to education and training (studies qualification, training courses, etc.);
- b) Data concerning former professional experiences, foreign languages, as well as any further information deemed useful to evaluate Data Subject’s CV, salary levels included, etc.;
- c) Data from public sources such as websites, social networks (data from data Subject’s Facebook / LinkedIn public profile, etc.), newspaper and magazines, specialized ones included, scientific journals or other information documents or publications that are published or may anyway be freely available to the public and websites specialized in promoting contact between job demand and offer.

Among the aforementioned information, there may be data classified as special category (sensitive) data or data concerning criminal offences or the execution of criminal penalties (judicial data) by the applicable regulation in force.

Special category / sensitive data (pursuant to Article 4 paragraph 1 letter d) of Data Protection Code and Article 9 paragraph 1 of EU Regulation), e.g. any data revealing Data Subject’s health status, maternity, injuries, inabilities, political or trade union organization membership, religious beliefs, disability status. In the event of spontaneous application, any special category / sensitive data shall be processed pursuant to Article 24 paragraph 1 letter i)-bis with no need for specific consent thereabout.

Data processing legal basis and purposes

Data Subject’s personal data, either required or acquired prior to or during selection and recruitment activities, shall be processed by Data Controller for the following purposes:

- a) To manage CV assessment;
- b) To plan and manage any selection interview, even in interactive or group modalities;
- c) To submit application to other companies being part of Costruzioni Meccaniche Luigi Bandera S.p.A.

The aforementioned data, sensitive ones included, shall be processed pursuant to Article 24 paragraph 1 letter b) of Data Protection Code and Article 6 paragraph 1 letter b) of EU Regulation in order to proceed with application

assessment activities, competence and capability evaluation with respect to Costruzioni Meccaniche Luigi Bandera S.p.A. needs.

All criteria set forth under Law Decree no. 125/91 shall be applied to prevent any gender discrimination at selection stage.

Communication and disclosure

Your data may be communicated to third parties acting as entrusted external companies such as, without limitations, companies operating in personnel selection and recruitment sector, in competence assessment activities and, if the case may be, companies from the healthcare sector appointed by Costruzioni Meccaniche Luigi Bandera S.p.A. for any technical and organisational reasons, to manage your application; external professionals and Costruzioni Meccaniche Luigi Bandera S.p.A. subsidiaries and/or associated companies, as well as companies, consortia and/or other legal entities in which Costruzioni Meccaniche Luigi Bandera S.p.A. takes part as shareholder; any Costruzioni Meccaniche Luigi Bandera S.p.A. companies that may be interested in establishing a job relationship with you. The aforementioned third parties, companies and professionals shall process your data as independent data controllers or, if necessary, as data processors purposely appointed by Costruzioni Meccaniche Luigi Bandera S.p.A.

Furthermore, in reason of the coordination and direction role by Costruzioni Meccaniche Luigi Bandera S.p.A., your data may be processed, within the framework of standard management of personnel selection and recruitment activities, by single employees of the aforementioned third parties in order to carry out any necessary organization, administration, finance and accounting activities that may be carried out by those companies in favour of other companies.

The above without prejudice to the Data Controller's obligation to communicate data to competent Authorities, upon request by the latter.

Cross-border transfer

As a standard, your data shall not be transferred outside the European Economic Area; should any data transfer outside the European Economic Area be necessary to manage selection and recruitment, data recipients shall be subject to data protection and security obligations equivalent to those ensured by Data Controller. In any case, cross-border communication shall involve data necessary to pursue intended purposes only and exclusively and, if required, warranties applicable to cross-border data transfer shall be applied.

Processing modalities and storage periods

Data Subject's data shall be collected and recorded in a lawful and fair manner to pursue the aforementioned purposes, in compliance with principles and provisions set forth under applicable regulation.

Personal data shall be processed by manual, automated and computerised means, fulfilling technical and organizational measures suitable for ensuring data security and confidentiality, especially for the purpose of minimizing any risks of data destruction or loss, even if unintentional, as well as unauthorized access or any processing that is not admitted by or compliant with data collection purposes.

Data Subject's personal data shall be processed by Costruzioni Meccaniche Luigi Bandera S.p.A. throughout selection and recruitment activities. In case of spontaneous application, Data Subject's data shall be stored for 12 months; once elapsed the aforementioned 12 months, data thereof shall be erased. In case of answer to a selection started by Costruzioni Meccaniche Luigi Bandera S.p.A., storage terms shall be the ones detailed in the statement and they shall anyway exceed 24 months from selection end; in any case, you may request your CV is stored for any future needs by Costruzioni Meccaniche Luigi Bandera S.p.A.

Data supply nature and consent to data processing

As detailed above, supply of your personal data shall be mandatory as it is necessary to pursue purposes under point 1. letters a) and b) with regard to personnel selection and recruitment procedures. On the other hand, the supply of your personal data shall be voluntary for purposes under point 1. letter c) where you shall freely choose whether to give specific consent, which may be anyway withdrawn. If your CV contains special category/sensitive data, processing shall be subject to relevant consent you shall issue in writing.

Data Subject's rights

You, as Data Subject, shall be entitled to exercise the rights conferred on you by law provisions; among others, you shall be entitled to:

- a) Access your personal data, receiving proof of purposes pursued by Data Controller, of data categories, of data recipients, of storage time, and of existence of any automated decision-making processes;
- b) Obtain the rectification of inaccurate personal data concerning you, without undue delay;
- c) Obtain data erasure, in any case set forth under regulation;
- d) Obtain restriction of processing or to oppose to processing, whenever possible;
- e) Require portability of data you supplied to Costruzioni Meccaniche Luigi Bandera S.p.A., i.e. to receive them in a structured, commonly used and machine-readable format, even to transmit those data to another data controller, without limitations by Costruzioni Meccaniche Luigi Bandera S.p.A.;
- f) Lodge a complaint with a supervisory authority for Personal data protection.

Should you need to ask further information about processing of your personal data or exercise of your rights, please contact Eng. Dulio Marco, Bandera **Data Protection Officer (DPO)**, in writing, at: corso Sempione no. 120 – 21052 Busto Arsizio (VA) or via e-mail at: qualita@lbandera.com.

Data Controller

Data Controller, pursuant to provisions set forth under Art. 4 of Data Protection Code and GDPR, shall be Costruzioni Meccaniche Luigi Bandera S.p.A., having its registered office at no. 120 Corso Sempione - 21052 Busto Arsizio (VA), VAT no. 00219880127 and Tax Code 00219880127.

Best regards,
Data Processor
Piero Bandera

The information notice hereof has been updated on 25 May 2018

EXPRESSION OF CONSENT

I, the undersigned, _____, having read the above information notice pursuant to Article 13 of Data Protection Code and Articles 13 and 14 of EU Regulation, give my free and informed consent to Costruzioni Meccaniche Luigi Bandera S.p.A. in order to:

- Process and, if the case may be, communicate my special category / sensitive data detailed in my CV to personnel selection and recruitment companies collaborating with Costruzioni Meccaniche Luigi Bandera S.p.A. for the purposes under point 1. letters a) and b).
- Communicate my personal data, special category / sensitive data included, to external companies for the purposes connected with my application and the relevant selection process.

[Place and date] _____

Signature for consent
