

Information on processing of personal data for candidates

Italmatch Chemicals S.p.A., with registered office in Arese (MI), at Via E. Vismara, 114 – 20044, tax code and Milan-Monza-Brianza-Lodi Companies Register no. 13471010150, VAT no. IT 13471010150 (hereinafter, for brevity, the “**Company**”), as the controller, wishes to inform you that, pursuant to Art. 13 of European Regulation no. 679/2016 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 (hereinafter, the “**Regulation**”) and to the national regulations, including the individual measures of the supervisory authority (the Personal Data Protection Authority), where applicable, the personal data you provide will be processed in compliance with current legislation and contractual provisions, for the purposes and with the methods indicated hereunder.

1. Type of personal data processed

1.1. The Company processes mainly the following categories of personal data:

- a. identification and contact data (such as first name, surname, date of birth, tax code, street address, e-mail address, telephone contacts, residence, domicile);
- b. data on previous work experience (such as positions held, hiring data, company role, salary and benefits, if any, periodic assessments, other data on work experience), professional qualifications and professional information published by the candidate;
- c. tax and income data (such as tax code, previous salary);
- d. data provided by sending the *curriculum vitae* (such as images present on the *curriculum vitae*) and other data collected in the personnel recruitment and assessment process, including the data provided by filling out the data collection form present on the Company website and/or communicated by you via e-mail and/or other channels of communication;
- e. special categories of data, likely to reveal health status (documentation relating to a disability or to being in a protected category);
- f. other personal data provided by the candidate themselves.

2. Purposes of processing and legal basis for processing

2.1. The purposes for which the personal data you provide is collected and processed relate to the search for and recruitment of candidates, both in the case of spontaneous candidacy for future recruitments and in the case of candidacy submitted in response to a specific job listing; to allow sending of service notices relating to open positions (e.g. by e-mail, telephone contact and/or other channels of communication).

The legal basis for processing of the data you have provided is what is envisaged by Art. 6.1(b) of the Regulation (“*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract*”) and/or Art. 6.1(c) of the Regulation (“*processing is necessary for compliance with a legal obligation to which the controller is subject*”) and/or Art. 6.1(f) of the Regulation (“*processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child*”).

2.2. Processing will, in any case, be performed by the controller and/or by any processors duly appointed in accordance with Art. 28 of the Regulation, including third parties with whom the Company has entered into a specific personnel search and recruitment contract, in order to provide a prompt and efficient service in management of the pre-contractual search and recruitment phase.

2.3. It is necessary for said personal data to be provided (as indicated in more detail in Art. 1 of this policy document) for performance of the activities associated with the personnel search and

recruitment process (as indicated in more detail in Art. 2.1 of this policy document) and the Company will be unable to consider the candidacy in a recruitment process if it is not provided; if special categories of personal data are provided, processing will only take place when justified by specific and legitimate purposes, in order to start an employment relationship, also taking specific duties and/or specific characteristics of the professional profiles requested into account.

3. Processing methods

- 3.1. The Company will process the personal data using automated means and manual processing, according to the principles of lawfulness, fairness and transparency laid down by personal data protection regulations and protecting the confidentiality of the data subject and their rights by implementing appropriate technical and organisational measures to ensure a level of security appropriate to the risk, pursuant to Art. 32 of the Regulation.
- 3.2. As part of the recruitment process, the Company may conduct checks on the information provided (e.g. academic qualifications and previous employers), solely for purposes of recruitment .

4. Storage of the personal data

- 4.1. Your personal data will be processed and stored for the time necessary to pursue the purposes for which it has been acquired. In detail, your personal data will be stored for the time necessary to perform the recruitment procedures or, in the case of a successful outcome, for the duration of the employment relationship.

If a job offer is not received or not accepted at the end of the recruitment procedures, your personal data will be stored for a maximum period of three years from when it is provided.

- 4.2. Your personal data will also be stored for the period indicated here above in order to demonstrate, in the case of dispute, that the selection and recruiting processes have been performed without discrimination, fairly and transparently.
- 4.3. The personal data needed to satisfy statutory and fiscal obligations will also be stored subsequently, in compliance with said obligations and the storage time envisaged by applicable regulations at the time.
- 4.4. After said times, the personal data will be erased and/or destroyed.

5. Communication, disclosure and transfer of the personal data

- 5.1. Your personal data might be shared with specific categories of recipients, such as parties who may access the data by virtue of laws, regulations or EU regulations, within the limits laid down therein.
- 5.2. Your data might be communicated to third parties with whom the Company has entered into a specific personnel search and recruitment contract, in order to provide a prompt and efficient service in management of the pre-contractual search and recruitment phase. Said parties act according to the instructions of the Company, as the processors pursuant to Art. 28 of the Regulation, on the basis of specific contractual agreements.
- 5.3. Your personal data might be communicated to other companies in the Group, for purposes of management of the personnel recruitment process.
- 5.4. Your personal data will not generally be disclosed and transferred outside the European Union. However, when, due to specific needs of coordination of group activities in participation in the personnel recruitment process, it is necessary to transfer the personal data to countries outside the EU, including countries that do not provide adequate protection, the Company undertakes to guarantee adequate levels of protection, including contractual protection, according to applicable regulations, including the use of standard contractual clauses.

6. Rights of the data subject

6.1. The rights of the data subject in relation to processing of the personal data described in this document are set forth by the Regulation (Arts. 15-21), and include:

- a. the right to obtain confirmation as to whether or not their personal data exists and access to that data (right of access);
- b. the right to have the personal data completed, amended and/or corrected (right to rectification);
- c. the right to request erasure or restriction of processing of personal data processed unlawfully, including data for which storage is not necessary in relation to the purposes for which it has been collected or otherwise processed (the right to be forgotten and the right to restriction of processing);
- d. the right to object to processing (the right to object);
- e. the right to withdraw consent, if given, without affecting the lawfulness of processing based on consent before its withdrawal;
- f. the right to lodge a complaint with the Supervisory Authority, in the event of a breach of personal data protection regulations;
- g. the right to receive a copy in electronic form of their personal data provided as part of the recruitment process (e.g. data on previous work experience) and to ask for that data to be transmitted to another controller (right to data portability).

6.2. These rights may be exercised through written notice, to be sent via registered letter with acknowledgement of receipt to the following address: Italmatch Chemicals S.p.A., Via Magazzini del Cotone no. 17, Modulo 4, 16128 Genoa, to the attention of the HR Office.

6.3. You can contact the controller in order to exercise these rights.

7. Identity and contact details of the Controller

7.1. The Controller of the personal data is Italmatch Chemicals S.p.A., with registered office in Arese (MI), at Via E. Vismara, 114 - 20020, tax code and Milan-Monza-Brianza-Lodi Companies Register no. 13471010150, VAT no. IT 13471010150, in the person of the *pro tempore* legal representative.