

**PRIVACY POLICY**

pursuant to Art. 13 of EU Regulation 679/2016 and applicable privacy provisions

Leased employees - Seconded employees

Introduction

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data ("**Regulation**") and any other EU or national provision and/or regulation applicable to the protection of personal data, **ROSETTI MARINO S.P.A.**, Via Trieste 230 48122 Ravenna, Italy, the Controller ("**Company**" or "**Controller**") informs you that the personal data ("**Data**") provided by you as a result of the agreement entered into by the Seconding company and the Company or otherwise acquired as part of our Company's activity, may be processed in accordance with the following.

1. Categories of personal data and related sources

The Data communicated to the Company by third parties (e.g. Staffing agencies or entities) refers to personal details, as well as identification, contact and professional background information, and is necessary for the organisation and management of the leased employment relationship itself.

2. Purposes and legal basis for the processing

The Controller collects and processes personal data referring to you in the context of the work activities performed by you for the Company. The information processed is compulsory and necessary to properly execute the agreement entered into by the Seconding company and our Company (e.g. personal details, curriculum information, days off work, sick leaves, etc.). Below is an explanation of the purposes for which your data is processed, as well as the legal basis underpinning the processing thereof.

The Company processes the Data for the following purposes:

- (i) the management and execution of the agreement entered into by the Seconding company and our Company;
- (ii) purposes related to the management of your work activity (e.g. tools for rendering work services).

The legal basis for the processing of Data aimed at pursuing the above purposes is the execution and proper management of the agreement entered into by the Seconding company and our Company.

- (iii) Organisational, production and safety purposes, as well as for the purpose of protecting the company's IT/computer assets, for the prevention of offences also through the use of verification systems concerning the correct execution of company procedures and/or regulations.
- (iv) The management of disputes in the event of breaches, claims, litigation and/or settlements.

The legal basis for the processing of Data for the purposes illustrated above is the pursuit of a legitimate interest of the Company and/or of third parties (e.g. in the event of litigation) which, based on the assessments made by the Company, is not prejudicial to your rights.

- (v) Purposes connected with the fulfilment of obligations established by law, regulations, national and EU legislation and provisions issued by authorities empowered to do so by law.

The legal basis for the processing of Data for this purpose is the fulfilment of obligations laid down in the law and applicable regulations.

For the pursuit of the above-mentioned purposes, our Company will process the so-called '*Personal*' Data (e.g. personal details, contact details, professional experience, family composition, etc.) and '*special*' data, e.g. health status (medical

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certificates relating solely to fitness/unfitness for work, sick leaves, maternity leaves, accident leaves, or required for the purposes of assessing the suitability for certain jobs, justification of absence from work, compulsory and contractual insurance and social security protection, accidents at work and job placement for the disabled) or relating to trade union membership. Specifically, special Data will be collected and processed in accordance with the provisions of the law and the applicable National Labour Contract.

It should be noted that information concerning the state of health in the performance of tasks related to health surveillance provided for by the employment relationship is processed exclusively by the responsible occupational physician and under no circumstances is transmitted to the seconding company and/or the host company (except, precisely, the states of fitness/unfitness for work).

3. Nature of data provision and consequences of failure to provide data

For the execution of the purposes listed above, the processing of Data is necessary and failure to provide it will make it impossible for the agreement between the Seconding company and the Company to be executed.

4. Categories of persons/entities to whom the data may be disclosed

Data will not be disclosed and may, including '*special*' data, be communicated, for the above-mentioned purposes, to the following categories of persons/entities: (i) the seconding company for the fulfilment of the charges and obligations relating to social security and welfare contributions incumbent on it by reason of your employment relationship with the same; (ii) companies belonging to the same corporate group as our Company (iii) persons, companies, associations or professional firms that provide assistance, consultancy, and services to our Company, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters; (iv) banking institutions and insurance companies; (v) parties whose right to access the Data is recognised by provisions of law and secondary regulations or by provisions issued by authorities empowered to do so by law. The persons/entities belonging to the above-mentioned categories will use the Data in their capacity as autonomous controllers or Processors, such as in connection with the management of payroll and contributions.

These persons/entities may be established in EU and non-EU countries. In particular, in the event that these persons/entities are established in non-EU countries, the Company shall adopt the measures provided for in the Regulation to legitimise the transfer of personal data to them.

The list of persons to whom the data is or may be disclosed, as well as an indication of the privacy measures adopted to legitimise the transfer of data to extra-EU entities, may be requested from the Company by contacting the addresses indicated in the 'Data subjects' rights' section.

The Data may also be brought to the attention of our personnel who will process it in their capacity as personnel in charge of data processing.

5. Data retention criteria

The Data will be processed for the entire duration of the agreement between the Seconding company and our Company, after which it will be retained in accordance with the ordinary limitation periods set out in the Italian Civil Code or specific legal provisions, for administrative purposes and/or to exercise or defend a right or a legitimate interest, and it will be deleted when the purposes for which it was collected no longer apply.



6. Data subjects' rights

We inform you that, in the cases expressly provided for in the Regulation, you may exercise the rights set out in Art. 15 et seq. of the Regulation and precisely you may:

- (i) request confirmation that the Data is being processed and, if so, ask the Controller for access to the information relating to such processing;
- (ii) request that incomplete or inaccurate Data is rectified;
- (iii) request the Controller to delete the Data;
- (iv) request the restriction of the processing;
- (v) request to receive, in a commonly used and machine-readable format, the Data concerning you or to obtain that such Data is transmitted directly to another controller, where technically feasible (so called '*data portability*').

In addition, you have the right to object, either wholly or partially, for legitimate reasons, to the processing of the Data that concerns you.

The aforementioned rights may be exercised by sending a request to the e-mail address: privacy@rosetti.it.

Finally, if you consider that the processing of the data provided violates the data protection legislation, you have the right to file a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

7. Policy update

This policy was updated in January 2024.

The Controller

Rosetti Marino S.p.A.

DocuSigned by:

Ermanno Bellettini

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Ermanno Bellettini

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