



REGULATION NOTICE
under the Act 13, Regulation (UE) 2016/679 (“GDPR”)

1. THE CONTROLLER

Fratelli Cosulich S.p.A., headquarters at Via Dante Alighieri 5, Trieste (TS), Italy, on behalf of their pro tempore legal representative, is the controller of Your personal data (the “**Data Controller**” or “**F.lli Cosulich**”).

2. PERSONAL DATA AND RELATED INFORMATION

Under GDPR, the term is defined as “any information relating to an identified or identifiable natural person. The data subjects are identifiable if they can be directly or indirectly identified, especially by reference to an identifier such as a name, an identification number, location data, an online identifier or one of several special characteristics, which expresses the physical, physiological, genetic, mental, commercial, cultural or social identity of these natural persons” (“**Data**”).

In addition, the GDPR defines all the special categories of personal data as “genetic, biometric, health data, sexual orientation and related health data, as well as personal data revealing racial and ethnic origin, political opinions, religious or ideological convictions or trade union membership” (i.e. “**special categories of personal data**”).

As part of the recruitment and candidate selection services, F.lli Cosulich processes the Data included in Your curriculum vitae and/or in other documents You provide us, which include, in particular:

- ✓ name and surname;
- ✓ date and place of birth;
- ✓ home address;
- ✓ contact details, such as phone number and email address;
- ✓ qualifications, work experience;
- ✓ any further information that might be included in Your curriculum vitae;
- ✓ any additional personal data required for the purposes of boarding

While evaluating the applications F.lli Cosulich has no interest in collecting Your special categories of personal data. Therefore, the Controller asks You not to provide this information.

Your Data contribution is voluntary; however, the refusal to provide this data will make it impossible for the Controller to evaluate Your application.

The legal basis for the processing of Your Data is the execution of the contract, in particular, the management of Your work application and the performance of the services requested.



3. THE PURPOSE OF THE PROCESSING

F.lli Cosulich Company will process Your Data in order to evaluate Your application's suitability in relation to open job offers at our clients, the potential employers, operational structures.

F.lli Cosulich can process your data, through the use of traditional communication systems (eg. E-mail), to inform you about the open job offers.

4. SHARING OF DATA WITH THIRD PARTIES LOCATED IN EU TERRITORY

The Controller can share Your Data with third parties, with whom the controller engages to accomplish selection of the personnel related activities, as well as with their own clients who act as potential employer in case of a job opening.

Particularly, in order to achieve the objectives described in paragraph 3, as part of the processing, Your Data may be shared with foreign companies that offer F.lli Cosulich IT and administration services, meaning, where appropriate, to agencies which offer evaluation and personnel selection services or to external consultants who will process Your Data acting as the Data Processor.

The list of the Data Processors is available for consultation, from the Controller.

The Controller may share Your Data, other than if required by the law, with local authorities, other associate companies located in the European Union as well as with their own clients who act as potential employer in case of posts or job openings that might be of Your interest, namely clients interested in Your profile.

No sharing of Your data with unspecified third parties is contemplated.

5. SHARING OF DATA OUTSIDE OF THE EUROPEAN UNION

Additionally, to accomplish the tasks previously mentioned Your Data may be shared with other firms of the corporation of which the Controller is a part, namely third-party clients of the Controller and/or other firms of the Company located outside of the European Economic Area, who may potentially be interested in your job application.

The aforementioned sharing of Data, when required, will be regulated according to the recipient, through the use of standard contractual clauses in use by the European Commission by decision 2010/87/UE as amended and in force at the time, or in alternative, on the basis of a decision of adequacy of the Commission and/or of any other tools permitted by the regulation of reference, and if required, the use of binding corporate rules under the intra-group transfer.

You will be able to receive information on Your Data's transfer location, sending an email to info@cosulich.it.



6. DATA RETENTION PERIOD

The Controller will process Your Data for 24 months following Your last expression of interest; by way of example, Your Data will be stored for the 24-month period, starting:

- ✓ from the end of a role to You assigned by a F.lli Cosulich client;
- ✓ from Your last request of information regarding open job roles;
- ✓ from Your last expression of interest in a job offer with a F.lli Cosulich client, regardless of the result of the related selection process.

After the previously mentioned 24 months from Your last expression of interest and, if in the meantime, there has been no action from you demonstrating your intention to seek for employment through the services offered by the Data Controller, the Data included in your *curriculum vitae* and any further documents provided by you will be permanently deleted.

7. YOUR RIGHTS IN THE CAPACITY OF THE DATA SUBJECT

For the period of time in which F.lli Cosulich are processing or storing the aforementioned Data, You, as the Data Subject, can, at any time, exercise the following rights:

- The right of access – You have the right to obtain confirmation that your Data is being processed, as well as the right to receive any related information to the process;
- The right to rectification – You have the right to rectify Your Data in our possession, in the case of their being inaccurate or incomplete;
- The right to erasure – under certain conditions, You have the right to have your Data erased from our archives;
- The right to restrict processing – in certain circumstances You have the right to restrict the processing of Your Data;
- The right to Data portability – You have the right to obtain the transfer of your Data in our custody to a different Data Controller;
- The right to object – You have the right to object, at any moment for reasons concerning your individual situation, to the processing of Data that concerns you for legitimate interests task carried out in the public interest or for the exercise of official authority, including the profiling, unless there are compelling legitimate grounds for the Controller to continue processing, which override the interests, rights and freedoms of the individuals or for the establishment, exercise or defense of legal claims;
- The right to withdraw consent – You have the right to withdraw Your consent to the processing of Your Data at any time, maintaining the lawfulness of the process, based on the consent given before the withdrawal;
- The right to file a complaint with supervisory authorities –in the event that F.lli Cosulich refuse to answer your access requests, refusal reasons will be provided. If that is the case, You have the right to lodge a complaint as described in paragraph 8.

All related requests are to be addressed to F.lli Cosulich, exclusively at this email address gdpr@cosulich.it.



8. COMPLAINTS

If you wish to lodge a complaint regarding the manner in which F.lli Cosulich is processing Your Data, which is in regard to the management of a complaint You have proposed, You have the right to file an application directly with the supervisory authority.