

## PRIVACY POLICY FOR CANDIDATES ARTICLES 13 and 14 OF REGULATION (EU) 2016/679

Dear Candidate,

EU Regulation no. 679 of 27 April 2016 (hereinafter "the Regulation") provides for the protection of individuals with regard to the processing of their personal data.

We therefore invite you to read the privacy policy below and to consent to the processing of your personal data, where required.

C.O.I.M. S.p.A. — CHIMICA ORGANICA INDUSTRIALE MILANESE - (hereinafter also the "Company"), in the course of its business activities has a strict policy for the security and confidentiality of personal data of persons who enter into any kind of relationship with the Company ("data subjects"). Their data will therefore be processed lawfully and correctly, in conformity with the provisions of the Regulation.

Pursuant to Article 13 of the Regulation, the Company must provide you with specific information regarding the processing of your personal data and of special categories of your personal data (personal data and special categories of personal data are indicated below, together, as "Data").

## <u>IDENTIFICATION PARTICULARS OF THE DATA CONTROLLER</u>

The Data Controller of your personal data is the company C.O.I.M. S.p.A. - CHIMICA ORGANICA INDUSTRIALE MILANESE, with registered office in Buccinasco (MI), via Delle Azalee no. 19, and sub-offices/production sites in Offanengo (CR), via Ricengo no. 21/23, and in San Martino in Strada (LO), via privata Fabrizio De Andrè no. 24, VAT NUMBER 00798810156.

#### PERSONAL DATA CONCERNING YOU THAT MAY BE COLLECTED

The Data collected refer to the information contained in your Curriculum Vitae, or information you have entered on the Company's website, or such Data are drawn from University databases or from your LinkedIn profile or other Social Networks. Data may also be collected based on the verification of references (if carried out), such as your affiliation with any institution, academic record, work history and other information relevant to determining your suitability as a candidate. Other than this, Data may also include information from your profile on professional networks (as applicable), photographs, notes taken during interviews, and comments from other parties such as contact persons, which may be generated during the personnel recruitment process. Data may be updated based on publicly available information and/or collected by third parties, and/or directly from you. The Company also reserves the right to check the veracity of the Data, particularly in relation to the qualifications obtained, previous work experience, professional appointments or institutional positions, also by contacting those whom you indicate as company contact persons, as well as your previous employers and any other person/entity with whom you may have had dealings in the course of your work.

Data acquired shall not include personal beliefs, trade union or political affiliation or political, religious or trade union opinions, sexual orientation, marital or family or pregnancy status, disability, race, ethnic or national origin, colour, linguistic group, health status, disputes with previous employers ("Special categories of data", below), or facts that are not relevant when assessing your professional competences and aptitudes, unless these features affect the way you perform your job or are an essential and determining requirement for the job in question.



We kindly request you to promptly report any changes in your personal data to the relevant company office in order to ensure compliance with Article 5 of Regulation EU 2016/679, which requires data collected to be accurate and, therefore, up to date.

#### **PURPOSES YOUR PERSONAL DATA CAN BE USED FOR**

The collection and processing of your Data are necessary in order to implement pre-contractual measures adopted for purposes connected with or instrumental to the Company's personnel headhunting and recruitment activities.

Only with your consent, the Company may also process images and/or video of you, as a component of its specific personnel selection procedures.

Basis of the data processing: the provision of data pursuant to current data protection rules, including special categories of data within the aforementioned limits, is mandatory as it enables the Company to acquire adequate knowledge so it can assess candidates as part of the personnel recruitment process, and also to comply with applicable legal obligations and legislative and regulatory provisions. Failure to provide such data may make it impossible to engage in any personnel headhunting and recruitment activities and to institute the employment relationship.

#### **HOW WE KEEP YOUR PERSONAL DATA SECURE AND FOR HOW LONG**

The processing of your Data shall be based on principles of correctness, lawfulness and transparency and may also be carried out using automated methods for storing, managing and transmitting said Data. Data will be processed using instruments and procedures that guarantee its security and confidentiality and avert the risk of loss, unauthorised access, unlawful use and data dissemination.

Your Data will be retained and stored for as long as necessary for personnel selection purposes (for a specific position or also for future positions of potential interest). In particular, your personal particulars, contact details and educational training record will be retained for potential recruitment procedures in the future. Any other data contained in your curriculum vitae will be deleted when the period of time necessitated for purposes of recruitment has elapsed.

#### DATA PROCESSING THROUGH VIDEO SURVEILLANCE

The Data Controller informs you that it has put in place a video surveillance system at its premises. The system aims to meet internal security needs and to permit the monitoring of access to the various activities of C.O.I.M. S.p.A., and has the following purposes:

- to assist in the legal defence of C.O.I.M. S.p.A. or of third parties involved in legal proceedings, in the event that offences are committed;
- to safeguard employees, persons in general, property and company assets;
- to prevent unlawful acts of any kind.

The purposes of the data processing observe the principles of correctness and lawfulness and conform with legal provisions whose purpose is to protect the confidentiality of your data, not least those set out in the Italian Data Protection Authority's General Provision on video surveillance of 8 April 2010 currently in force, and in Article 4(1) of Law no. 300/1970.

Images collected shall not be used to directly or indirectly monitor employees who are videoed in the course of their duties.



The video equipment will facilitate the reviewing as well as recording of the data filmed.

Your personal data are communicated primarily to authorities responsible for the control and supervision of security/safety, and also to third parties/recipients who, also on behalf of the Company, handle security in the workplace or who manage, on its behalf, the activities of caretakers security/surveillance details, IT consultants, assistance/maintenance companies. Third parties/recipients carry out their activities in compliance with specific legal obligations which the Data Controller is required to observe through them. Any communication that does not meet these purposes will require your consent.

#### How and for how long are video surveillance data stored?

Only the Data Controller, specially designated internal and external data processors and duly authorised data handlers have authority to view and record video-surveillance images and footage. The video surveillance system only enables the processing of personal data collected by means of filming, which only occurs on Company property based on the actual positioning of video cameras. The video surveillance system is designed to display and record filmed images.

The images are kept only for as long as strictly necessary in order to facilitate the aforementioned purposes, and also (as applicable) in order to comply with requests from the judicial authorities (including judicial police), and also in order to safeguard and facilitate the data subject's right of access pursuant to Articles 15 et seq. of the Regulation .

#### WHO WE SHARE YOUR PERSONAL DATA WITH

Your personal data may be accessed by employees of the Human Resources department, duly authorised, and by external suppliers who provide support in the supply of the services, and who will be appointed as Data Processors if necessary.

### **CONTACT PERSONS**

If you wish to exercise your rights and make a report for any reason associated with the processing of your Data, you can send an email to the following address: privacy@coimgroup.com.

# YOUR DATA PROTECTION RIGHTS AND YOUR RIGHT TO FILE COMPLAINTS WITH THE SUPERVISORY AUTHORITY

You are entitled to request

- ✓ C.O.I.M. S.p.A.:to have access to Data concerning you, and to have such data corrected or erased;
- ✓ to have incomplete Data supplemented;
- ✓ to have the data processing restricted;
- ✓ to receive Data in a format that is structured and in common use and readable on an automatic device (portability);
- ✓ to revoke, at any time, any consent given in relation to the processing of your images;
- ✓ to oppose the use of your Data, in whole or in part, for legitimate reasons.

For any complaints or reports concerning the manner in which your Data is processed, we will do our best to address your concerns. Nevertheless, should you wish to do so, you can make a complaint or report to the Italian Data Protection Authority, using the contact details on the website www.garanteprivacy.it.

The Data Controller



C.O.I.M. S.P.A.

The Candidate acknowledges and accepts that by registering on the website www.coimgroup.com and uploading his/her curriculum vitae, he/she expressly consents to the processing of his/her images (Including video images) for the purposes of the Company's personnel headhunting and recruitment procedures.