



Data Protection Management System

Doc. **INF-DPMS.01A** Rev. **02** of **20/12/2022** Classification: **L1 – PUBBLICO**

PRIVACY POLICY FOR CANDIDATES

Made in accordance with Articles 12, 13 and 14 of Regulation (EU) 2016/679

F.IIi Gancia & C. S.p.A.

Legal and operational headquarters: C.so Libertà, 66 – Canelli 14053 (AT)

VAT No. F/Company Register: IT 00619260052, docId:06C8E9E1C10410262072DAFB65E9FB4B - REA Code: AT - 58097

PEC: amministrazione@gancia.postecert.it

Phone +39 0141 8301

e-mail: dataprotection@gancia.it

LIST OF CONTENTS

1	AD	DRESSEES OF THE DOCUMENT	. 3
2	FOI	REWORD	. 3
3	PUI	RPOSE	. 3
4	DEI	FINITIONS	. 3
5	PEF	RSONAL DATA CONTROLLER	. 3
_	.1 .2	DATA PROTECTION OFFICER - DPO	
6	ου	R CORPORATE DATA PROTECTION POLICY	. 3
7	PUI	RPOSE OF PROCESSING	4
8	FUI	RTHER TREATMENT	. 5
9	PEF	RSONAL DATA SUBJECT TO PROCESSING	. 5
9	.1 .2 .3	PERSONAL DATASPECIAL CATEGORIES OF DATAINFORMATION ON CRIMINAL CONVICTIONS	. 5
10	PRI	NCIPLES APPLICABLE TO DATA PROCESSING	6
11	MA	NDATORY OR OPTIONAL NATURE OF PROVIDING DATA	6
12	FUI	RTHER INFORMATION ON CONSERVATION	6
13	ME	THODS OF TREATMENT	6
		AUTOMATED DECISIONS	
14	sco	OPE OF DATA COMMUNICATION AND DISSEMINATION	6
15	DA [·]	TA TRANSFER ABROAD	. 7
16	RIG	HTS OF THE DATA SUBJECT	. 7
17	CO	MPLAINT TO THE CONTROL AUTHORITY (ART. 77 GDPR)	. 7
18	DIS	CLOSURE UPDATE	. 7
		ALEY A	_

RECIPIENTS OF THE DOCUMENT

This document is addressed to individuals who propose their candidacy by spontaneously sending CVs to the company F.IIi Gancia & C. S.p.A. (hereinafter simply "Company" or "F.IIi Gancia & C.") or through the recruitment companies or services used by F.IIi Gancia & C.

FOREWORD

In order to make this document more understandable and transparent to the reader, we felt it necessary to use simple and colloquial language. Therefore, the use of a less formal tone should not be interpreted as a lack of respect or courtesy to the Candidate but simply a way to facilitate communication.

PURPOSE 3

In compliance with the guidance set forth in Regulation (EU) 2016/ 679 (hereinafter, "Regulation" or "GDPR") regarding the processing and free movement of personal data, You have the right to know all information regarding the processing of Your personal data in a clear and transparent manner.

This information is provided to you at the time of acquisition of the information or, in case of spontaneous sending of the CV, at the time of the first useful contact following the receipt of Your CV. All further information acquired after the selection phase and necessary for the activation of the employment contract, will be processed for the purposes stated in the document INF-DPISMS.01 - EMPLOYEE INFORMATION which will be issued to you only at the time of employment.

DEFINITIONS

Definitions of terms used in this policy, are to be understood as per Article 4 of the EU Regulation 2016/679.

5 PERSONAL DATA CONTROLLER

F.IIi Gancia & C. S.p.A. (hereinafter simply F.IIi Gancia & C.) is the Data Controller of your personal data in accordance with the Regulations. Below is the contact information:

F.IIi Gancia & C. S.p.A.



Legal and operational headquarters: C.so Libertà, 66 - Canelli 14053 (AT)

C.F./P.IVA IT 00619260052, docId:06C8E9E1C10410262072DAFB65E9FB4B - REA Code:

AT - 58097

PEC: amministrazione@gancia.postecert.it

Phone +39 0141 8301

e-mail: dataprotection@gancia.it

Data Protection Officer (DPO): dpo@gancia.it

DATA PROTECTION OFFICER - DPO

F.III Gancia & C. although not required to appoint a DPO under Article 37 of the GDPR, but considering the protection of personal data to be of primary importance, has nevertheless decided to appoint a Data Protection Officer, who can be contacted at the following e-mail address: dpo@gancia.it

5.2 **DATA PROTECTION COORDINATOR**

F.III Gancia & C., also pursuant to art. 2-quaterdecies of Legislative Decree 196/2003 (the so-called "Privacy Code"), has taken steps to appoint a company Data Protection Coordinator with the task of supervising the compliance of processing with GDPR.

The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate you in the possible exercise of your rights under the Regulations.

You can contact the Data Protection Coordinator at the following e-mail address: dataprotection@gancia.it

OUR CORPORATE POLICY ON THE PROTECTION OF PERSONAL DATA

F.III Gancia & C., has always been very attentive to the security of the information it manages, with particular regard to information that may contain personal data (ex art 4.1 GDPR) or special categories of personal data (ex art. 9 GDPR). For this reason, the company has decided to adopt a single organizational model, called Data Protection Management System (hereinafter "DPMS" or "System"), also based on the guidelines of ISO 27001 standards. Taking into account the context of

F.IIi Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 3 by 12 Classification: L1 - PUBBLICO

our organization, supply chain requirements and stakeholder expectations, the System, establishes Leadership and commitment of the Data Controller, through the definition of organizational roles, internal and external responsibilities and authority of those involved. Within the DPMS, security objectives are identified and the actions necessary to achieve them are planned. The necessary resources and expertise are also ensured in order to constantly and continuously improve the System over time, periodically verifying its scope and alignment with corporate purposes.

PURPOSE OF PROCESSING

Personal data contained in Your application (e.g. CV), or collected during the selection process, will be processed exclusively for the following purposes:

ID Description of purpose, basis of lawfulness, origin of data, and duration of processing

Purpose: To manage, analyze, rank, evaluate and select applications and make selection for the purpose of the possible establishment of an employment and/or collaboration relationship.

Lawfulness: These processing operations will be carried out in accordance with Art. 111 BIS of Legislative Decree 101/2018 and Art. 6(1)(b) of the GDPR as they are pre-contractual measures necessary to activate the employment contract. This is the legal basis used when Your personal data are necessary for the execution of the contract to which You are a party or the execution of all pre-contractual measures taken at Your request. For the processing considered in this notice, reference is made only to the Employment Contract.

While this is not the legal basis normally used for the processing of Your data referred to in this notice, we may F1 sometimes require Your consent under Article 6.1(a) of the GDPR for some specific purpose. In this case you will be promptly informed in writing and have the right to withdraw Your consent at any time.

Data provenance: Data are conferred directly in CVs, conferred voluntarily during interviews, acquired through third parties.

Duration of processing: Processing will cease upon expiration of the selection process or within 2 years of receipt of your application (e.g., CV). However, the data may be further processed if you have been deemed suitable for possible future job positions.

Further Retention: If deemed appropriate and lawful, at the end of the processing duration, Your personal data may be further retained for civil or judicial reasons (see purpose F3).

Purpose: To fulfill legal obligations, regulations arising from EU legislation, or arising from instructions issued by public authorities or supervisory bodies.

Lawfulness: These processing operations are carried out due to legal obligation under Art. 6 par. 1(c) of the GDPR. Data provenance: Data are conferred directly by you in CVs, during interviews, acquired through third parties (e.g., companies or selection services).

Duration of treatment: Treatment will cease when the legal obligation expires.

Further Retention: Consistent with the retention period imposed by law, if deemed necessary and lawful, Your data may be further retained for civil or judicial reasons (see purpose **F3**).

Purpose: To take protective actions to protect the interests of the Company or those of third parties such as, for example, exercising defense in court and/or enforcing rights.

Lawfulness: These processing operations are carried out in accordance with Art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Owner.

Data provenance: Data subject to retention processing are conferred or collected for all the purposes stated in this document.

Duration of processing: Until the purposes of protection are achieved.

Further Retention: We will retain Your personal data for the prescriptive term provided by the legislation for the protection of related rights, subject in any case to longer retention periods provided by specific sector regulations. Specifically, the data will be processed and/or retained for a period of 10 (ten) years from the achievement of the purposes of collection.

F.IIi Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 4 by 12 Classification: L1 - PUBBLICO

Purpose: Anonymization for internal analytical and statistical purposes. In some circumstances, for processing for purposes F1 and F2 we may anonymize certain data so that it can no longer be associated with You, in such cases it will be possible for us to use such data without further notice to You and retain it indefinitely. We will only carry out anonymization if we are able to ensure and demonstrate over time that we cannot associate such data with You again (e.g., through Reverse Engineering techniques).

For example, the data may be used to process labor market statistics, quality, security, access to web services, etc. Should the use of Your anonymized data be required to feed statistics that may fall outside of Your legitimate expectations, we will be responsible for providing You with specific information and collecting Your consent if necessary.

Lawfulness: This anonymization processing will be carried out in accordance with Art. 6 par. 1(f) of the GDPR on the basis of the Legitimate Interest of the Owner.

Data Source: Data are collected for purposes F1 and F2

Duration and Retention: We will retain and use the anonymized data indefinitely.

8 **FURTHER TREATMENT**

If, during the selection process, further and specific processing, not indicated in this policy, should become necessary, it will be the responsibility of F.IIi Gancia & C. provide specific information in advance and, if appropriate, proceed to acquire the necessary consent. This principle will also be applied if the processing of special categories of data (ex art. 9 of the GDPR) or the processing of personal data relating to criminal convictions and offenses (ex 10 of the GDPR) is necessary and lawful if this is required by law.

9 PERSONAL DATA BEING PROCESSED

9.1 PERSONAL DATA.

You should know that we may record, store, and use the following information about you or referable to you:

- Personal identifiers such as title, name, date of birth, age, gender, residence, personal e-mail, telephone number, as well as, if necessary, social security number, ID card number, driver's license number, passport;
- Curriculum Vitae (CV) that will include information about YOUR educational background and details such as qualifications, academic data, schools, training and professional skills;
- Data of a special nature (e.g., data relating to Your health condition) freely entered by You in the resume or otherwise disclosed by You;
- Additional information necessary for selection and as consistent as you can reasonably expect by virtue of the job title

9.2 **SPECIAL CATEGORIES OF DATA**

Some of the personal data processed may belong to the special categories of personal data ("data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, or genetic or health-related data" -Article 9 GDPR).

Gradually with respect to the selection process, we may, in particular, process data related to disability conditions (possible registration in the targeted employment) to assess Your suitability for work and to ensure compliance with the provisions of Law No. 68 of March 12, 1999.

The processing of such data will take place in compliance with the prescriptions contained in the Authorization for the Processing of Sensitive Data in the Employment Relationship (No. 1/2016) updated to the Provision of the Supervisory Authority of December 13, 2018 ("Provision identifying the prescriptions contained in the General Authorizations that are compatible with the Regulations and Legislative Decree No. 101/2018 adjusting the Code" - Web Doc. No. 9068972).

9.3 **INFORMATION RELATED TO CRIMINAL CONVICTIONS**

We will collect information regarding criminal convictions only when appropriate given the nature of the role and as long as such investigation is permitted by Law.

F.IIi Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 5 by 12 Classification: L1 - PUBBLICO

10 PRINCIPLES APPLICABLE TO DATA PROCESSING

From the stage of collection of information, any processing carried out by us will respect the principle of relevance and non-excessiveness by virtue of the purposes pursued by the same. We inform you that access to Your personal data by the individuals we appoint, is allowed only if the knowledge is considered strictly essential to the pursuit of the purposes outlined in this document.

11 MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA

For the purposes stated in this notice, the provision of personal data is a necessary requirement, and any refusal by You to provide the requested information may prevent, in whole or in part, the performance of activities aimed at the conclusion of the selection process, or the fulfillment of legal obligations, regulations arising from EU legislation, or arising from instructions issued by public authorities or supervisory bodies. By way of example, **F.Ili Gancia & C.** may be unable to select you as a candidate to fill the required role.

12 FURTHER INFORMATION ON CONSERVATION

CVs and data collected during the selection process, will be deleted/destroyed or anonymized within **90** days after the expiration of the retention periods stated in <u>paragraph 7</u>.

13 MODE OF TREATMENT

We inform you that, with logics strictly related to the purposes of collection, in **F.Ili Gancia & C.** we adopt and observe strict procedures and security measures to store, use and allow you to view Your personal data by means of paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or unlawful processing and from accidental loss, destruction or damage.

Specifically, Your data are:

- collected solely for the stated purposes and subsequently processed in accordance with those purposes;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- accurate and, if necessary, updated, deleted and/or corrected, including according to Your input, if any;
- used and retained for a period of time not exceeding the fulfillment of the purposes for which they are collected.

13.1 AUTOMATED DECISIONS



In order to select applications, **F.Ili Gancia & C.** does not implement automated decisions based on Your personal data.

13.2 SAFETY



With reference to the processing of their personal data, **F.Ili Gancia & C.** took steps to census the risks to the rights and freedoms of the candidates, also taking into serious consideration the impending risks to the computer systems used. The risks were subsequently dealt with by analyzing the sources of risk and mitigating the threats capable of materializing them.

14 SCOPE OF DATA COMMUNICATION AND DISSEMINATION

For the pursuit of the purposes stated herein and to the extent strictly necessary for that purpose, **F.Ili Gancia & C.** makes use of the activities of external parties with whom special agreements on the processing of personal data are stipulated to regulate the relations of **Ownership/Responsibility** under the Regulations (e.g. external parties that carry out technical, commercial, legal, administrative consulting activities, companies that provide Cloud IT services, data processing, shipping and transport services, banks, entities, public administrations, authorities, supervisory bodies, etc.).

Internally, individuals involved in the processing activities of Your personal data are bound to confidentiality, properly trained and appointed as "**Authorized**" subjects for processing.

Subject to any legal obligations, Your personal data will not be disseminated in any way.

For more information about who can learn about Your personal data, you can contact our Corporate Data Protection Coordinator.

F.Ili Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 6 by 12
Classification: L1 – PUBBLICO

15 DATA TRANSFER ABROAD

Normally, to carry out the application selection process, **F.Ili Gancia & C.** does not transfer candidates' personal data outside the European Economic Area (EEA). However, should Your personal data be transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions by the Commission of the European Union, **F.Ili Gancia & C.** will ensure that appropriate safeguards are in place to protect your personal data in these countries. Some of the safeguards that might be adopted, where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymization, and if possible encryption of the data itself.

By way of example but not limited to, please note that the transfer abroad of Your personal data is often related to the use of cloud technologies, digital communication systems, security software and protection of IT services. I these cases, our Company is committed to using services chosen from operators that guarantee higher standards of security and attention to the protection of personal data.

In this regard, we would like to inform you that. **F.Ili Gancia & C.** uses some ICT services, provided by U.S. companies such as, for example, Microsoft, Google and Apple, which act as our Data Processors pursuant to art 28 of the GDPR.

For this reason, we sign service contracts and "Data Processing Agreements" (DPAs) with such companies, which also include the "Standard Contractual Clauses" (SCCs) established by the European Commission under Article 46(1) GDPR. However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow U.S. authorities access to our data as a result of the so-called "Cloud ACT."

16 RIGHTS OF THE DATA SUBJECT

As a data subject, you may at any time exercise your rights under Articles 15 to 22 of the Regulations. In particular, in the manner and within the limits of the law, You have the right to ask our company for access to Your personal data, rectification, cancellation or restriction of the processing of personal data concerning You and to object to their processing. To exercise Your rights You can use the contact channels provided in this document.



You can get more information about the rights applicable to the treatments stated in this policy within ANNEX A

17 COMPLAINT TO THE CONTROL AUTHORITY (Art. 77 GDPR)

Without prejudice to the possibility of turning to **F.Ili Gancia & C.** to obtain any information or for the exercise of Your rights, we inform You that You may lodge a complaint before the competent independent administrative authority in the Member State of the European Union where You habitually reside, where You work, or where You believe an alleged violation of the law on the protection of Your personal data has occurred. In the Italian territory you can file a complaint with the Garante per la Protezione dei Dati Personali (GPDP). For information on how to submit Your complaint to the 'authority you can use the following contact details:



Data Protection Authority

Switchboard: +39 06.696771

E-mail address: garante@gpdp.it

PEC address: protocollo@pec.gpdp.it

Web site: https://www.garanteprivacy.it

18 DISCLOSURE UPDATE

This policy, **INF-DPMS.01A** "CANDIDATES PRIVACY DISCLOSURE" Version 02 effective as of 20/12/2022, replaces the previous one issued on 25/05/2018. The document is revised periodically as regulatory and/or company changes occur. If there is a change in its basic parts (such as purposes, methods, to whom we communicate data, where we transfer it, etc.) it will be the responsibility of our company to inform you of the change.



You can find the updated version of this policy on the institutional website of **F.Ili Gancia & C. S.p.A.** at the following link: https://gancia.it/privacy

ANNEX A

GUIDE TO THE EXERCISE OF RIGHTS APPLICABLE TO TREATMENTS DECLARED IN THE CANDIDATE INFORMATION INF-DPMS.01A VER. 2 OF 20/12/2022

F.Ili Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 7 by 12

Classification: L1 – PUBBLICO

RIGHT OF ACCESS (Art. 15 GDPR).

As a data subject, you have the right to obtain confirmation as to whether or not we are processing personal data about you and, if so, to obtain access to the following information:

- 1. the purposes of processing;
- 2. the categories of personal data in question;
- 3. The recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if recipients in third countries or international organizations;
- 4. when possible, the intended retention period of personal data or, if not possible, the criteria used to determine this period;
- 5. the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing;
- 6. The right to file a complaint with a supervisory authority;
- 7. where the data have not been conferred directly by You, all available information about their origin;
- 8. the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic used, as well as the consequences of such processing for You.
- 9. If Your personal data is transferred to a third country or an international organization, You have the right to be informed of the existence of adequate safeguards in accordance with Articles 45-50 of the GDPR.



Your right to obtain a copy of the data will only be allowed if it can be done without infringing on the rights and freedoms of others. Should you decide to exercise this right, we will provide you with a copy of the personal data being processed. If you request additional copies, we may charge you a fee based on our administrative costs.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its basis of lawfulness. In particular:



Conditions of non-applicability

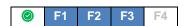
The right does not apply to data already anonymized for **F4** purposes

RIGHT OF RECTIFICATION (Art. 16 GDPR)

You have the right to obtain from us the modification and updating of Your personal data without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of Your incomplete personal data, including by providing us with a supplementary declaration.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its lawful basis. In particular, it is applicable to the following treatments:



Conditions of non-applicability

The right does not apply to data already anonymized for **F4** purposes

F.Ili Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 8 by 12

Classification: L1 – PUBBLICO

RIGHT TO CANCEL "RIGHT TO OBLIGATION" (Art. 17 GDPR)

You have the right to obtain the deletion of personal data concerning you without undue delay.

Conditions of applicability

We grant you this right for the following treatments when any of the following reasons exist:

1. when personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed:



Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F4** purposes
- 2. if You have withdrawn the consent on which the processing is based and there is no other legal basis for continuing it in the absence of Your authorization. The right does not apply to any of the processing stated in this notice.



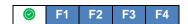
Specific conditions of non-applicability

- The right is not applicable because no processing stated in the notice is based on the consent of the data subject
- 3. If You object to the processing and there is no overriding legitimate reason for Us to proceed with the processing anyway:



Specific conditions of non-applicability

- The right does not apply to processing done for purposes F1 and F2 because it is not based on legitimate interest and to data already anonymized for purposes F4
- 4. Should personal data be processed unlawfully:



5. If personal data must be deleted to fulfill a legal obligation to which we are subject as the Data Controller:



Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F4** purposes
- 6. Where personal data have been collected in connection with the provision of information society services:



Specific conditions of non-applicability

The right does not apply to any of the treatments stated in this policy.

F.Ili Gancia & C. S.p.A. Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 9 by 12

Classification: L1 – PUBBLICO

RIGHT TO LIMIT PROCESSING (Art. 18 GDPR).

This right is guaranteed for all processing carried out by us regardless of the lawful basis used.



Personal data subject to limitation, are processed, except for storage, only with Your consent or for the establishment, exercise or defense of a right in court or to protect the rights of another natural or legal person. In addition, We inform You that if You have obtained a restriction of processing You are informed by the data controller before such restriction is lifted.

Conditions of applicability

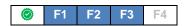
You have the right to obtain restriction of processing when one of the following occurs:

1. You have disputed the accuracy of Your personal data; the restriction will be applied for the period necessary to allow us to verify the accuracy of such data:



Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F4** purposes
- 2. processing is unlawful and You object to the deletion of Your personal data by requesting, instead, that its use be restricted:



Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F4** purposes
- 3. although we no longer need it for processing purposes, personal data are necessary for Te to establish, exercise or defend a right in court:



Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F4** purposes
- 4. You have objected to the processing; the restriction will be applied pending verification as to whether our legitimate reasons for its continuation prevail:



Specific conditions of non-applicability

The right does not apply to data already anonymized for purposes **F4** and to processing carried out for purposes **F1** and **F2 because** they are not based on legitimate interest.

RIGHT TO NOTIFICATION (Art. 19 GDPR)

You have the right to obtain from us direct communication to each of the recipients to whom Your personal data have been transmitted, regarding Your requests for rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, should you deem it appropriate, you have the right to obtain a list of the recipients of Your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawful basis used:



F.Ili Gancia & C. S.p.A.

Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 10 by 12

Classification: L1 – PUBBLICO

Specific conditions of non-applicability

×

The right does not apply to data anonymized for F4 purposes

RIGHT TO PORTABILITY OF DATA (Art. 20 GDPR).

You have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you that we have provided to us and you have the right to obtain from us the direct transmission of such data to another data controller if technically feasible.

Conditions of applicability

This right is guaranteed only for processing that has consent or contract as its legal basis and is carried out by automated means:



Specific conditions of non-applicability

X

The right does not apply to the processing carried out by us

RIGHT OF OPPOSITION (Art. 21 GDPR)

You have the right to object at any time to the processing of Your personal data based on our legitimate interest, including profiling.



We will refrain from further processing Your personal data only if we are unable to demonstrate the existence of legitimate reasons overriding Your interests, rights and freedoms. Processing will continue even if the data are necessary for the establishment, exercise or defense of a right of ours or of third parties in litigation.

Conditions of applicability:

The legal basis for processing must be legitimate interest. The right is applicable to the following processing:



Specific conditions of non-applicability

×

The right does not apply to processing carried out for purposes **F1** and **F2** because it is not based on legitimate interest, and to processing carried out for purposes **F3** because it is necessary for ascertainment and defense in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATIC DECISION MAKING PROCESSES (Art. 21 GDPR)

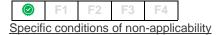
You have the right not to be subjected to a decision based solely on automated processing (including profiling) that produces legal effects concerning You or significantly affects You in a similar way. In addition, You have the right to obtain human intervention by the Controller, to express Your opinion and to challenge the automated decision.

In any case, decisions should not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) of the GDPR applies and appropriate measures are in place to protect Your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:

- Is necessary for the conclusion or performance of a contract between us;
- Is based on Your explicit consent;
- the decision is authorized by Union or member state law.





The right does not apply to any of the treatments stated in this policy because none of them subjects the data subject to a decision based solely on automated processing.

RIGHT TO REIMBURSEMENT OF DAMAGE (Art. 82 GDPR)

Please be advised that anyone who suffers tangible or intangible damage caused by a violation of Regulation 2016/679 has the right to obtain compensation for such damage.

FORMS FOR THE EXERCISE OF RIGHTS

To exercise Your rights towards our Company, we advise You to use the following form made available by the Supervisory Authority:

https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924

Please remember that YOUR identification is always required from us.

End of Document

F.IIi Gancia & C. S.p.A.

Doc. INF-DPMS.01A Rev. 02 of 20/12/2022 Page 12 by 12 Classification: L1 – PUBBLICO