

	PRIVACY POLICY ("Privacy Policy")	Versione:	000
		Data:	May 2018
		Prepared by:	Gianluca Passuti
		Approved by:	President of the Board of Directors

PRIVACY POLICY FOR APPLICANTS
("Privacy Policy")
(Version "00", May 2018)

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1. General provisions

1.1. Introduction. O.M.P. Officine Mazzocco Pagnoni S.r.l. ("Company") is committed to protecting personal data according to (i) the Regulation (EU) 2016/679 *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* ("GDPR") as well as (ii) the applicable Italian legislation on personal data protection ("National Data Protection Laws").

1.2. Purpose of the Privacy Policy. This Privacy Policy establishes how the Company processes personal data and information provided by applicants by sending their *curriculum vitae* and by virtue of subsequent interviews (if any) for a potential recruitment or working relationship with the Company ("Applicants").

1.3. Role of the Company. The Company processes Applicants' personal data as a data controller. The identity and contact details of the Company are showed in the Company's letterhead and in any case are available on the Company's website.

1.4. Updates and revisions. The Company reserves the right to amend and/or update the Privacy Policy, also as a result of new legislative measures or revised provisions of any National Data Protection Laws and/or the GDPR and/or EU laws and regulations on personal data protection. For this reason, the Privacy Policy shall be marked with progressive identification numbers and month of publication, starting from the version of May 2018, identified by the identification number "00". Any new version of the Privacy Policy shall be released as a replacement of the previous versions and shall be valid and applicable from the date of communication to Applicants.

1.5. Applicable rules. The Company carries out processing activities in accordance with (i) provisions of National Data Protection Laws; (ii) provisions of the GDPR, as directly applicable; (iii) guidelines and decisions issued by the Italian Data Protection Authority ("Data Protection Authority").

2. Data subjects and scope of application

2.1. Subjects affected by the Privacy Policy The Privacy Policy is addressed to Applicants, who provide their personal data either directly to the Company or to third parties (for instance, recruitment agencies), that may be engaged by the Company for personnel recruitment and selection activities.

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2.2. Scope of application. The Privacy Policy is applicable to processing operations run by the Company for the purpose of carrying out activities related to Applicants' assessment and selection.

3. Nature, types and source of processed data

3.1. Processed personal data. The Company processes Applicants' personal data that consist in common data – which do not fall within the definition of sensitive and/or judicial data as set forth in the National Data Protection Laws nor within the special categories of personal data as set forth in the GDPR nor within the definition of health data (hereinafter jointly referred to as "Particular Data") – with the exception of some Particular Data, which might be contained in *curricula* and/or which the Company is required to know with regard to the employment relationship which could be established, including, in particular, belonging to protected categories or pre-employment medical assessments. With specific regard to Particular Data, which could be processed by the Company, it is hereby specified that said category of personal data may include: (i) data strictly necessary in relation to the employment activity subject to the selection procedure and/or (ii) data constituting an essential requirement for work purposes. Applicants are therefore asked not to provide Particular Data, where said data are not strictly connected to the abovementioned cases and in any case to give their specific consent to the processing of the said data (if any).

3.2. Source of processed personal data. Personal data, including Particular Data, is contained in Applicants' *curricula* or however provided to the Company by the same data subjects in the course of possible subsequent interviews, aimed at assessing the skills and necessary conditions for a potential recruitment or working relationship with the Company.

4. Purposes of the processing, legal basis and period of data retention

4.1. Purposes, legal basis and data retention period. The Company processes Applicants' personal data, including Particular Data, for the following purposes, as specified in the table hereinbelow ("Table"), in which is furthermore highlighted (a) the relevant legal basis and (b) with regard to data subjects' consent, if an express consent to processing is needed (or not), as well as (c) the data retention period:

	Purposes	Legal basis	Consent	Data retention period
A	Collect and analyse personal data contained in Applicants' <i>curricula</i> sent/delivered directly to the Company, to assess the skills and qualifications with a view to organizing an interview.	This processing is necessary to take steps at the request of Applicants by sending/delivering their <i>curricula</i> , prior to entering into an employment contract (analysis of data contained in <i>curricula</i>).	Not required	<i>Curricula</i> are retained for the period of time necessary to make assessments and in any case for a period of time not exceeding one year from the date of receipt of the same; upon expiry of this period, <i>curricula</i> received shall be destroyed, unless (i) they may be of interest with regard to a recruitment and selection in progress or (ii) at the end of the



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				<p>selection procedure, an employment/collaboration contract is concluded with the Company, in which case the Applicant's personal data shall be retained in the respective files, according to the data retention period set out in the Privacy Policy for employees.</p>
B	<p>Collect and analyse personal data contained in Applicants' <i>curricula</i> made available by the same to third parties (for instance, recruitment agencies) which may be engaged by the Company in order to assess the skills and qualifications with a view to organizing an interview.</p>	<p>This processing is subject to the Company's legitimate interest to perform activities aimed at recruiting and selecting people to fill the vacancies.</p>	not required	<p><i>Curricula</i> are retained for the period of time necessary to make assessments and in any case for a period of time not exceeding one year from the date of receipt of the same; subsequently <i>curricula</i> received shall be destroyed, unless (i) they may be of interest with regard to a recruitment and selection in progress or (ii) at the end of the selection procedure, an employment/collaboration contract is concluded with the Company, in which case the Applicant's personal data shall be retained in the respective files, according to the data retention period set out in the Privacy Policy for employees.</p>
C	<p>Collect and analyse personal data (including Particular Data, subject to the limits indicated in article 3.1) provided by Applicants also in the course of interviews, with a view to interviewing/assessing Applicants and inserting them in the Company's recruiting process for a potential hiring or working</p>	<p>This processing is necessary to take steps at the request of Applicants by sending/delivering their <i>curricula</i> prior to entering into a contract (analysis of data contained in <i>curricula</i>). With regard to Particular Data (if any) provided by Applicants, this processing is necessary to fulfil</p>	Required, with regard to Particular Data which may be provided also in the course of interviews further to submission of <i>curricula</i> .	<p>Personal data provided by Applicants also in the course of interviews are retained together with <i>curricula</i> forwarded or delivered to the Company for the same data retention period as specified above with regard to the purpose indicated sub A).</p>

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	relationship with the Company.	obligations and exercise rights according to article 9.1 letter b) of the GDPR. However, in compliance with principles applicable to data processing as provided by the GDPR, a specific Applicants' consent is required during the first interview subsequent to submission of their <i>curriculum vitae</i> .		
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4.2. Optional/mandatory supply of data. After the submission of a *curriculum vitae*, the provision of personal data by Applicants during subsequent interviews (if any) with persons in charge of the Company is optional. However, Applicants' failure to provide personal data, including Particular Data (in full or in part) which are necessary to assess skills and qualifications required with regard to the working position being searched shall prevent the Company from carrying out all necessary and instrumental activities related to the possible establishment of the employment/collaboration relationship with the Company itself.

5. Persons in charge of the processing and processors

5.1. Controller and persons in charge of the processing. The Company is the controller of Applicants' personal data for carrying out the processing activities as specified in the Table. Directors, shareholders, managers, employees and independent collaborators of the Company (independently from the contractual relationship concerned) may process Applicants' personal data in their capacity as persons in charge of processing, according to National data Protection Laws and to article 29 of the GDPR.

5.2. Processors. The Company may designate as processors external entities/individuals, including, but not limited to, professional advisers and service providers, entitled to process personal data on behalf of the Company for specific purposes. The complete list of processors (if any) of personal data covered by this Privacy Policy may be required by Applicants by sending (i) a written communication even via email to the Company's HR Department to the following address privacy@omppumps.com or (ii) any written communication even via email to the address and contact details set out in article 1.3. According to the GDPR, the Company is not obliged to designate a data protection officer.

5.3. Limitations. Persons in charge of processing activities as well as processors (if any) shall be appropriately instructed and empowered to allow access to Applicants' personal data, including Particular Data, subject to the specific duties and tasks assigned to them (even by virtue of a contractual relation, for instance, in the event of a contractual relation with a processor, according to article 28.3 of the GDPR) and in compliance with the Privacy Policy

6. Method and place of processing

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6.1. Method of processing. Personal data covered by this Privacy Policy is processed almost exclusively through automated procedures, by using computerized systems or in some cases through manual means, but, in any case, adopting methods which are strictly related to the purposes for which such data is collected and anyway to ensure its security, in accordance with the GDPR and the National Data Protection Laws.

6.2. Place of automated data processing. Processing of personal data covered by this Privacy Policy is carried out in part in the head-offices of the Company, with storage on the Company's servers and in part on servers of processors appointed by the Company to manage the recruitment and selection activities.

6.3. Place of manual data processing. When Applicants' personal data is collected offline (e.g. on paper) all relevant document (including *curricula*) where said data is contained is stored in the head offices of the Company or of the processors and service providers (where appointed) and inserted in appropriate archives, locked and accessible only to personnel duly authorized.

6.4. Dissemination and communication. Applicants' personal data will not be disseminated. Applicants' personal data may be communicated to external processors and/or service providers identified and appointed according to article 28 of the GDPR.

7. Applicants' rights

7.1. Rights. Applicants may directly address to data controller or data processor/s which may be appointed by the controller, in order to enforce their rights according to provisions of National Data Protection Laws and to the GDPR (articles 15 et seq.) and in particular to have access to their own personal data, obtain updating and rectification or erasure of the same, restriction of processing, as well as obtain data portability by sending a communication as follows (i) via e-mail to the address privacy@omppumps.com or (ii) through any other mean to the address and contact details indicated in article 1.3. or to the following contact details of Company's HR Department: personale@omppumps.com

7.2. Right to object. With the same procedures established in the paragraph above, Applicants may object, in whole or in part, to the processing of personal data concerning them, where the relevant legal basis is constituted by the legitimate interest of the Company, pursuant to and for the purposes of the provisions of article 21 of the GDPR.

7.3. Complaint. Without prejudice to the above, any Applicant who believes that the processing of data concerning him or her is in violation of the GDPR, in accordance with article 77 of the GDPR, may lodge a complaint with the Data Protection Authority (where such a supervisory authority is based in the Country where the Applicant usually lives or works) or with a supervisory authority where the alleged violation has occurred.

7.4. Withdrawal of consent. Applicants, who have given consent, shall have the right to withdraw the given consent at any time, provided that the withdrawal of consent shall not affect the fulfilment of mandatory provisions provided by the legislation in force at the time of the request for withdrawal of consent. Applicants' consent may be withdrawn by sending a written notice to the Company at the address and contact details indicated in article 1.3 or at the above specified contact details of the Company's HR Department, which shall perform all necessary and subsequent activities with regard to the withdrawal of consent.

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I the undersigned _____ having read the Privacy Policy and obtained the information by the Company, provided during the first interview, subsequent to the submission/delivery of the *curriculum vitae* related to myself:

- with regard to the processing of my personal data (including Particular Data, if any) for the purposes specified in letter C) of the Table set out in the Privacy Policy (article 4.1):

Give my consent

Do not give my consent

 (Place and date)

 (Applicant's signature)