

Information notice employees MSC Technology Italia S.r.l.

ENGLISH VERSION

Information notice pursuant to Articles 13/14 of the Regulation (EU) 2016/679 – General Data Protection Regulation (hereinafter “GDPR”)

The present information notice informs about the processing of your personal data. The document has been drafted according to articles 13 and 14 GDPR, as well as the Opinion 2/2017 “on data processing at work” drafted by Working Party 29 (the Working Party on the Protection of Individuals with regard to the Processing of Personal Data).

This information notice (hereinafter “**MSC TechNotice**”) concerns specifically the processing of personal data performed by MSC Technology Italia S.r.l as an independent Data Controller.

1. DATA CONTROLLER

With reference to this notice, the Data Controller is **MSC Technology Italia S.r.l.** (hereinafter “**MSC Tech**” or the “**Controller**”) with registered address at Via Nizza, 262/Int.27 10125 Turin (Italy), email IT161-privacy_msctech@msc.com.

2. DATA PROTECTION OFFICER of MSC Tech.: the Controller also appointed a Data Protection Officer (hereinafter “**DPO**”) pursuant to articles 37 et. seq. GDPR in charge for monitoring the compliance of the Company from a privacy standpoint, available at the following email address: dpo.msctechnology@dpoprofessionalservice.it.

3. SOURCE OF PERSONAL DATA (in the case of personal data collected from third parties and not directly from the data subject)

We could obtain personal data directly from you or from other sources. In this latter case we may obtain them from a source publicly accessible. In fact, MSC Tech may acquire your personal data by consulting for instance, official journals and/or official registers held by public authorities for some categories of professionals (e.g. engineers). We could obtain personal data also from recruiting agencies and/or head hunters.

4. MAIN DEFINITIONS – CATEGORIES OF PERSONAL DATA BEING PROCESSED

processing/process/processed means: “any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction” (art. 4 par. 1, n. 2 GDPR).

data subject means: “the natural person (identified or identifiable)”.

personal data means: “any information relating to an identifiable natural person (images, pictures and videos included), in particular by reference to an identifier such as a name, an identification number, a location data, an

online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity” (art. 4 par. 1, n. 1 GDPR).

special categories of Personal Data means: “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation” (art. 9 par. 1 GDPR).

CATEGORIES OF PERSONAL DATA CONCERNED: personal data and any special categories of personal data contained in the CV (e.g. personal details, contact details, image, protected category, payroll data etc.). Data relating to criminal convictions and offences may be requested only in cases where the processing is authorized by the law of the European Union or of the member states.

5. PURPOSE OF PROCESSING – LEGAL BASE – DATA RETENTION PERIOD – NATURE OF PROVISION

| Purpose of processing | Legal base | Data Retention period | Nature of provision (in the case of personal data provided directly by the data subject) |
|--|--|-----------------------|---|
| <p>A) Recruiting staff, research and selection of personnel for the purpose of establishing an employment relationship, also for any positions different from those for which the data subject is a candidate; storage of personal data also for future selections; managing applications in response to job vacancies posted on our website; interviews and any video-interviews (data processing including image / audio).</p> <p>For some job positions, and in certain circumstances established by Data Controller, the latter may ask the candidate to view some data in the last pay slip. In this case, the candidate must show the document only after having obscured any special categories of personal data (e.g.</p> | <p>Execution of pre-contractual measures adopted at the request of data subject art. 6 par. 1 lett. b) GDPR</p> | <p>24 months</p> | <p>Necessary in order to manage the application. Failure to provide the data will make it impossible to process the data for the purposes of research and selection of personnel.</p> |

| | | | |
|--|---|-----------|---|
| union membership, foreclosure of the fifth of the salary). | | | |
| B) Obtain references by contacting third parties, such as universities, former employers, schools, etc. | Consent Art. 6 par. 1, lett. a) GDPR | 24 months | Optional. Failure to provide the data will not allow you to request references. |

6. RECIPIENTS/CATEGORIES OF RECIPIENTS

Personal data provided could be communicated to recipients who will process them as Data Processors (art. 28 GDPR, that is to say the “*natural or legal person, public authority or agency or other body which processes personal data*” on behalf of MSC Tech), as independent Data Controller and/or as natural person acting under the Controller’s authority (art. 29 Reg. UE 2016/679) for the abovementioned purposes.

Namely, data will be communicated to:

- other companies within MSC Group;
- third parties who assist the Data Controller in the management of the information systems;
- any third parties and labor consultants for personnel selection purposes, in the context of assistance and consultancy relationships;
- any third parties for the purpose of obtaining references (eg universities, former employers, schools, etc.);
- subjects designated pursuant to Legislative Decree 81/2008 as the competent doctor designated by the employer;
- competent authorities for the fulfillment of legal obligations and / or provisions of public bodies, upon request.

The list of Data Processors is constantly updated and available at the Controller's office.

With regards to state of health, it may be subject to verification during the carrying out of pre-recruitment medical examination by a competent doctor designated pursuant to Legislative Decree 81/2008 which the Data Controller merely asks for a judgment of suitability or unsuitability for specific job duties. The Data Controller is not aware of specific information relating to your state of health, such as e.g. any pathologies, etc., except for the hypothesis in which the doctor deems it necessary as it is mandatory in order to fulfill legal obligations.

7. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Your personal data will be transferred in Switzerland according to article 45 GDPR (transfers based on an adequacy decision adopted by the European Commission). We may also transfer personal data to countries located outside the European Economic Area (USA and INDIA) in order to select specific employment profiles. In this case, the transfers are based on the stipulation of specific Standard Contractual Clauses pursuant to art. 46 GDPR. It’s possible to obtain information regarding the guarantees underlying the transfers by contacting the Data Controller.

8. DATA SUBJECTS’ RIGHTS

You can exercise your rights as expressed by articles 15 et. seq. of GDPR by writing to the Data Controller and the DPO at the above addresses.

You have the right, at any time, to obtain from the Data Controller the access to your personal data (**article 15**), request their rectification (**article 16**), their erasure when possible (**article 17**) or the restriction of their processing (**article 18**).

Furthermore, for the purpose of processing B, Section 5. of the present information notice, you have the right to withdraw your consent at any time without affecting the lawfulness of the processing.

You have also the right to data portability when applicable (**article 20**). In case of a request for data portability, the Data Controller shall provide your personal data to you in a structured, commonly used and machine-readable format.

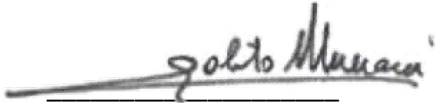
Finally, you have the right to lodge a complaint with the Supervisory Authority, that is to say the Italian Authority for the protection of personal data (<https://www.garanteprivacy.it/>), or file a complaint to the judiciary authorities.

9. AMENDMENT OF MSC TECHINFORMATION NOTICE

The Data Controller reserves the right to amend at any time the present document, which will be shared in accordance with GDPR principles, in particular the fairness and transparency principle established by art. 5 GDPR. For this reason, the MSC TECH Information Notice will indicate its last date of update.

Last update: 20 ottobre 2023

The Data Controller
MSC Technology Italia S.r.l.

A handwritten signature in black ink, appearing to read "Roberto Mariani", is written over a horizontal line.

(legal representative's signature)

DECLARATION OF ACKNOWLEDGMENT TO THE PROCESSING OF PERSONAL DATA, Reg. (EU) 2016/679 (GDPR)

The undersigned _____, declares to have received the information notice pursuant to art. 13/14 GDPR relating to the processing of personal data for the PURPOSE A) - processing by MSC Technology Italia S.r.l. for the research and selection of personnel - including processing that may have as their object particular categories of data and / or data relating to criminal convictions and offences.

Place and date _____

Signature _____

CONSENT

- I agree
- I do not agree

to the processing of data for PURPOSE B): request for references

Signature _____