



PRIVACY POLICY FOR EMPLOYEES

pursuant to art. 13 of Reg. (EU) 2016/679 (hereafter, "GDPR")

*EURODIES ITALIA SRL ensures protection and confidentiality
for the processing of personal data provided by employees of the Company*

Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and the Council



When signing a work contract, it is important for us to inform you how we collect and use personal data. We would like to assure you that processing of personal data is subject of great attention by EURODIES ITALIA SRL, which will also be called the "Company" hereafter.

The collection of personal data is carried out in compliance with:

- the European Regulation 679/16 ("GDPR")
- the Legislative Decree no. 196/2003 (i.e. the so-called "Privacy Code" - as amended by Legislative Decree no. 101/2018)
- the dictates of the Provisions of the Guarantor
- the legal provisions in force in the territory in which the Company operates
- Guidelines for the processing of private employee data - 23 November 2006

EURODIES ITALIA SRL is committed to protect the privacy and rights of the data subject and, according to the principles of the aforementioned regulations, the processing of the data provided will be based on the principles of fairness, lawfulness and transparency.

To whom this policy is addressed

This policy is for all employees who work for EURODIES ITALIA SRL

Who is the Controller and which category data are processed



The controller of your personal data is EURODIES ITALIA SRL, CF/P.IVA 00578730012, located in Avigliana (TO), in Viale dei Mareschi, 25, D +39 011 9572962, mail privacy@eurodiesitalia.com.

Purposes and lawfulness of processing



Your personal data are processed solely for the purpose of the performance and the management of your Contract. The legal basis for processing your personal data include the execution of the contract and pre-contractual measures, the ful-



fulfilment of any legal obligations and the safeguard of your interests. The legal basis is therefore the Contract signed with EURODIES ITALIA SRL and the fulfillment of any other legal obligation.

On the basis of the processing of your personal data, the company will be able to:

- I. assess your fit for the job or if you are suitable for another job position or sector
- II. ensure the right classification for work, salary and tax purposes, and correctly calculate the salary and expenses
- III. manage your salary or the agreed economic remuneration, plus any benefits, contractual institution awards or legal benefits
- IV. fulfill legal and contractual obligations, including those from any national or decentralized collective agreement
- V. monitor attendance at the workplace
- VI. provide training
- VII. take care of trade union relations
- VIII. activate digital badges, read and manage their data
- IX. fulfill the obligations towards social security and welfare institutions, both mandatory and supplementary, and manage the contributions and the processing of information necessary for retirement
- X. fulfill the obligations towards the State Administration, the Treasury and / or the judicial authorities (including the management of judicial data requested by the competent authority and/or in relation to criminal/civil/accounting/administrative/disciplinary proceedings)
- XI. collect evidence in the context of any disciplinary proceedings and manage it up to definition
- XII. manage any disputes relating to employment
- XIII. evaluate work performance
- XIV. protect health and safety in the workplace
- XV. activate access and work credentials, access to the archives, databases and e-mails.

EURODIES ITALIA SRL will use the data you provide only and exclusively for the purposes outlined in this policy, unless requested or authorized by the law, prior agreement with the data subject, or if the processing is in the fundamental interest of the data subject as, for example, in the event of a health emergency due to the Sars-Cov-2 epidemic or other medical emergencies.

EURODIES ITALIA SRL informs that with regard to the processing above, the Data Controller is not obliged to acquire the data subject's consent, as pursuant to article 6 of Reg. (EU) 679/2916, since the provision of personal data is necessary to enter into an employment contract, and is

necessary to fulfil the Data Controller's legal obligations and to meet the data subject's requirements. In case of judicial, administrative or arbitration actions aiming to assert or defend a right of the Controller, the legal basis of the processing is represented by the legitimate interest of the same

Processed data

Work relationship	Common and particular data	Personal data , including: name, surname, contact details, e-mail address, suitability for the job and possible belonging to protected categories, registration with trade unions, destination of 8 per 1000, and any other data necessary for the management of the employment relationship, including termination
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"Particular" data on health conditions, processed by the company physician in the performance of his/her duties, will be processed for the employer exclusively by the doctor himself/herself, as an independent data controller. Only the fitness to work will be communicated to the employer and to the relevant offices, which need this information to perform their duties.

The treatment may also be carried out by third party consultants who provide specific administrative, accounting, tax and instrumental services, according to the same purposes described in the previous paragraph.

Data provision



The provision of personal data is mandatory for everything required by legal obligations. If they are not provided by the data subject, it is not possible to sign an employment contract.

Processing methods



Your personal data will be processed using both analogical/paper means and computer/telecommunications means, and stored within our company systems which can only be accessed by authorized personnel in charge of data processing.

Furthermore, the processing may also be carried out by service companies or consultants who provide processing, administration or instrumental activities within the purposes outlined above.

The list is available, on request, from the Company.



In addition to that, with reference to the employment relationship, EURODIES ITALIA SRL can process data that the law defines as “particular” only for purposes strictly related to the performance of the contract.

Sensitive data which are processed by the company physician, as per the Legislative Decree no. 81/2008, in order to carry out preventive and periodic medical examinations, and which refer to your health, will be processed at EURODIES ITALIA SRL exclusively by the company doctor, as independent data controller. Access to health records will only be done by the company physician. However, the fitness to work will be communicated by the company physician to the employer and to the departments / offices that must be informed for the performance of their activities.

Personal data recipients



All personal data collected and processed will be communicated in Italy and not abroad, except for the communications carried out to fulfill legal and contractual obligations.

In compliance with the guidelines on transparency under Regulation WP 260/2017, for which the Controller has the duty of justifying the choice of indicating the recipients of the data by means of categories and guaranteeing their specificity, EURODIES ITALIA SRL considers it correct to identify the recipients of the communication by categories, since the list by name would be excessive and incomplete, taking into account the dynamism of the working environment.

Personal data may be communicated to:

- public bodies (INPS, INAIL, Territorial Labor Inspectorates, Tax Offices, etc)
- funds or coffers, including private pension and assistance funds
- credit institutions, Financial Companies, Insurance Companies, Supplementary Funds
- trade union organizations which have been given a specific mandate
- service providers (medical offices in fulfillment of obligations in the field of health and safety at work, consultants, professionals, payroll companies, etc.)
- all subjects not falling within the above categories to whom there is a legal obligation of communication

Transfer of personal data to third countries



The processing of the data does not involve their transfer to a third country.

Data storage period



All data will be processed and stored for the entire duration of the contract and after its termination for the fulfilment of any obligations concerning the end of the work relationship. The data will be kept for no longer than the period allowed by law, on the basis of the current regulations on data protection and in any case the cancellation will be made within 10 years from the termination of the employment relationship.

Automated individual decision-making



Automated individual decision-making is not contemplated (Art. 22 of the GDPR).

Rights of data subjects

Art. 15-22 of the GDPR set out the data subject's rights, among which:



<i>Right of access</i>	To obtain confirmation as to whether or not one's personal data are being processed
<i>Right to rectification</i>	To correct or complete personal data
<i>Right to erasure ('right to be forgotten')</i>	To erase personal data under specific circumstances
<i>Right to object</i>	To object to processing of personal data
<i>Right to restriction of processing</i>	To obtain restriction of processing in particular situations
<i>Right to data portability</i>	To receive one's personal data and transfer them to another controller
<i>Right not to be subject to automated processing</i>	The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling
<i>Right to lodge a complaint with a supervisory authority</i>	To appeal in case of data breach

- Right of access: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; and the envisaged period for which the personal data will be stored.
- Right to rectification: The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- Right to erasure ('right to be forgotten'): As outlined by Art. 17, subsection 3 of the GDPR, the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her when the personal data are no longer necessary, if consent is withdrawn, if the personal data have been unlawfully processed, or when personal data have to be erased for compliance with a legal obligation.
- Right to object to processing: The data subject shall have the right to object at any time to processing of their personal data which have as legal basis a legitimate interest of the Controller.
- Right to restriction of processing: The data subject shall have the right to obtain from the controller restriction of processing where the accuracy of the personal data is contested by the data subject, the processing is unlawful and/or the data subject has objected to processing.
- Right not to be subject to automated processing: The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, except when the decision is necessary for entering into, or performance of, a contract between the data subject and a data controller or is based on the data subject's explicit consent.
- Right to data portability: The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, and have the right to transfer those data to another controller, as set out by Art. 20, subsection 1 of the GDPR (only when the processing is based on consent given by the data subject and only when the processing is carried out by automated means).
- Right to lodge a complaint with the Data Protection Authority, as well as with the relevant supervisory authority, if he or she considers that the processing of his or her personal data infringes the Regulation (www.garanteprivacy.it).



All the rights listed above may be exercised at any time by sending a request via email to the address privacy@eurodiesitalia.com, or by handing in a written request to the Management or to Human Resources.

Policy updates

EURODIES ITALIA SRL may update periodically its policies, including this one, in compliance with regulatory changes, legal provisions and the supervisory Authority. The company will publish future updates on the website www.eurodies.com highlighting the new versions with due attention and in a timely manner.

We therefore invite you to periodically consult the company website where, at the “GDPR” button on the home page, you will find updates on the processing of personal data.

Avigliana (TO), 30.05.2022

Eurodies Italia srl