## Data protection policy

## (Pursuant to art. 13, Leg. Decree 196/2003)

#### 1. Data Controller

In the person of its legal representative, MGV CONSULTING S.a.s., a company established under Italian law with registered offices in Via S. Stefano, 21/G, Vigonza (PD), shall be the controller of the data referred to in this policy.

#### 2. Data supervisor

The supervisor of the data handling procedure is Mr. Gianmarco Vomiero.

### 3. Purpose of data handling

The collection and handling of personal data by MGV CONSULTING S.a.s. is carried out exclusively for the purposes of employee research, recruitment, development and assessment, administrative reasons and for internal communications activities.

### 4. Handling method

Data will be handled in compliance with the provisions of Italian Legislative Decree no. 196/2003. This handing shall be carried out both manually and using data processing and telecommunications media.

## 5. Type of data collected

The type of data being collected is that commonly found in a curriculum vitae, drawn up according to market logic. We therefore request the omission of any data that is irrelevant to the specific ends for which the data was collected.

#### 7. Data collection

The data collection process involves the sending of information by candidates relating to their professional experience to MGV CONSULTING S.a.s. This information is sent in the form of CVs.

- 7.1 The CVs received in reply to adverts published in the press or on the Internet are used exclusively for the advertised recruitment process. These CVs may be transmitted to the client company that is seeking personnel and which has been involved in the recruitment process from the beginning, or they may be retained by MGV CONSULTING S.a.s. even after the search has terminated.
- 7.2 If an MGV CONSULTING S.a.s. selector carries out search in the archives (that is, without publishing an advert), he/she may use CVs sent in speculatively (applications to be included in the database) and CVs resulting from previous personnel searches. The selector will meet with candidates even if he/she already met them during previous searches and put the new offer to them after obtaining the explicit consent of the interested party. No CV will be sent to the client company before the interview has taken place with the candidate. During this interview, the selector will propose the company to the candidate, as well as assess the candidate's profile. If the consent to data handling specifically requested by the law is not given, MGV CONSULTING S.a.s. will not be able to provide the service requested.

#### 8. Data storage

The data handling process will have a term that does not exceed the timeframe necessary for the ends for which the data was collected. All CVs received in reply to specific positions will be stored for a period of no longer than 2 (two) years at MGV CONSULTING S.a.s.,

after which they will be destroyed. MGV CONSULTING S.a.s. reserves the right to destroy CVs or any other document containing personal data not considered to be consistent with the purposes outlined in point 3. Data shall be handled using logic closely connected with the purposes indicated and methods that guarantee the security and privacy of the data. CVs attained through personnel research activities - for which MGV CONSULTING S.a.s. does not carry out any recruitment activities - are not registered and are forwarded directly on to the client company.

# 9. Rights of the interested party

Art. 7 of Leg. Decree 196/03 grants the interested party a number of specific rights, in particular: • the right to obtain confirmation of the existence of personal data that relates to him/her.

- the right to be informed of the source of personal data, the purposes and methods of data handling, the logic applied in the event of data handling using data processing tools, essential identification data relating to the controller and third parties to whom data may be communicated.
- the right to update, modify, cancel, transform into anonymous form or block data.
- the right to object to the handling of data for legitimate reasons.

# Equal opportunities

When managing its personnel recruitment processes, MGV CONSULTING S.a.s. pursues a policy of parity with regard to male and female workers and does not discriminate in favour of either gender, in compliance with Laws 903/77 and 125/91. For any further information on the methods used to handle personal data, on requests to confirm the existence of personal data, on requests to modify or cancel data, please send an email to <a href="cv@mgvconsulting.it">cv@mgvconsulting.it</a> clearly indicating the information desired or action requested.