



PRIVACY NOTICE

pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”)

This privacy notice describes how Fratelli Cosulich S.p.A. and the companies of the Fratelli Cosulich Group that may process personal data in the circumstances specified below will process your personal data in relation to your application for job positions within the Fratelli Cosulich Group through the “Career” platform.

The updated list of subsidiaries and affiliated companies of the Fratelli Cosulich Group that may access the “Career” platform (the “Group Companies”) is available at the following link: <https://cosulich.com/our-companies>.

1. Data Controllers

Depending on the specific processing purpose, the role of Controller or Joint Controller of your personal data will be as follows:

- **Fratelli Cosulich S.p.A.** acts as an independent Data Controller for the management of applications and personnel selection aimed at establishing an employment or collaboration relationship directly with Fratelli Cosulich S.p.A.
Fratelli Cosulich S.p.A., registered office in Trieste, Via Dante Alighieri 5, Tax Code and VAT No. IT00051020329, tel. +39 010 27151, email: info@cosulich.it.
- **Fratelli Cosulich S.p.A. and the Group Companies** act as Joint Controllers for the management of applications and personnel selection aimed at establishing an employment or collaboration relationship with one of the Group Companies (other than Fratelli Cosulich S.p.A.), including the management of spontaneous applications that may be of interest to the entire Group.

Should your curriculum vitae and related personal data be forwarded and shared with one or more Fratelli Cosulich Group Companies for the assessment of a specific position or for future opportunities, you will receive an email notification at the address you provided. Such notification will indicate the specific company to which your CV has been forwarded, thus ensuring your full awareness of the joint controllers involved in the processing of your data.



The Fratelli Cosulich Group Companies have entered into a joint controllership agreement that transparently defines their respective responsibilities in complying with the obligations arising from the GDPR. You may exercise your rights as a data subject against each of the joint controllers. In any case, the Group Companies have designated Fratelli Cosulich S.p.A. as the contact point for handling data subjects' requests. You may contact Fratelli Cosulich S.p.A. at info@cosulich.it.

2. Categories of Personal Data Processed

“Personal Data” means any information that can identify, directly or indirectly, a natural person, in this case you, who are applying for a job position with Fratelli Cosulich S.p.A. or another Fratelli Cosulich Group Company, or who are submitting a spontaneous application (“Personal Data”).

The Personal Data we collect and process include, by way of example:

- Personal and contact details: first name, last name, date and place of birth, tax code (if applicable), residential address, phone number, email address.
- Education and training data: educational qualifications, professional qualifications, training courses, certifications.
- Professional experience data: previous employment, duties performed, qualifications, acquired skills, references (if provided and subject to your specific consent).
- Skills data: languages spoken, IT skills, soft skills.
- Professional and salary expectations: desired positions, expected salary.
- Any other data voluntarily included by you in your curriculum vitae or cover letter.

Please note: we ask you not to include in your curriculum vitae or application any data relating to health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, or genetic and biometric data, unless they are strictly relevant and necessary for compliance with specific legal obligations (e.g. belonging to protected categories) and have been expressly requested.

3. Purposes and Legal Bases of Processing

Your Personal Data will be processed for the following purposes and on the basis of the related legal grounds:

1) Selection for open positions at Fratelli Cosulich S.p.A.

Management of the search, selection and evaluation process for personnel with a view to establishing an employment or collaboration relationship with Fratelli Cosulich S.p.A.

Legal Basis: performance of pre-contractual measures taken at your request (Art. 6(1)(b) GDPR). The processing of your Personal Data is necessary to assess your suitability for the position for which you have applied with Fratelli Cosulich S.p.A.

Data Controller: Fratelli Cosulich S.p.A.



2) Selection for open positions within the Fratelli Cosulich Group companies and management of spontaneous applications for the entire Group

Management of the search, selection and evaluation process for personnel with a view to establishing an employment or collaboration relationship with one of the Group Companies, including spontaneous applications aimed at assessing your profile for future positions that may become available within such companies, consistent with your skills.

Legal Basis: performance of pre-contractual measures taken at your request (Art. 6(1)(b) GDPR). The processing of your Personal Data is necessary to assess your suitability for the position for which you have applied with one of the Group Companies or to assess your spontaneous application.

Joint Controllers: Fratelli Cosulich S.p.A. and the Group Companies for which you have submitted your application or that may be relevant, in the case of a spontaneous application, for future opportunities.

3) Compliance with legal obligations

Compliance with legal, accounting, tax or administrative obligations to which the Controller or Joint Controllers are subject.

Legal Basis: compliance with a legal obligation (Art. 6(1)(c) GDPR).

Data Controller(s): Fratelli Cosulich S.p.A. or the relevant Group Company, depending on the specific obligation.

4. Processing Methods

Your Personal Data will be processed mainly through IT and telematic tools, including through the “Career” platform, using logic strictly related to the purposes indicated and, in any case, in such a way as to ensure their security and confidentiality.

5. Nature of the Provision of Personal Data

The provision of your Personal Data is optional. However, if you do not provide them, we will be unable to consider your professional profile for the positions for which you have applied.

The provision of your data for the management of spontaneous applications and for the retention of your CV for future positions is optional, but if you do not provide them it will not be possible to consider your spontaneous application. If, following your spontaneous application, you no longer wish your CV to be retained for future opportunities, you may inform us at any time as indicated in section 9.

6. Categories of Recipients of Personal Data

Your Personal Data may be disclosed to:



- **Authorized personnel:** depending on the purpose, personnel of Fratelli Cosulich S.p.A. (e.g. HR Department, line managers) for selections relating to Fratelli Cosulich S.p.A., and personnel of the Fratelli Cosulich Group companies (e.g. HR Department, line managers for the respective positions) for selections involving the Group;
- **External service providers:** third parties performing outsourced activities on behalf of the Controller or Joint Controllers (e.g. IT service providers, companies managing the “Career” platform, recruitment agencies only if expressly appointed), who will act as Data Processors duly appointed pursuant to Art. 28 GDPR and subject to specific contractual obligations for data protection;
- persons, entities or authorities to whom disclosure of your Personal Data is mandatory by law or by orders of the authorities;
- public administrations;
- other Fratelli Cosulich Group companies.

The updated list of recipients to whom your Personal Data may be disclosed is available by writing to info@cosulich.it.

7. Transfer of Data to Third Countries (Outside the EU)

Please note that, due to the presence of Fratelli Cosulich Group companies also in non-EU countries (outside the European Economic Area), your Personal Data may be transferred to such countries.

The Controller or Joint Controllers undertake to ensure that such transfer takes place in compliance with the provisions of Chapter V of the GDPR (Art. 44 et seq.), by adopting appropriate safeguards, such as, by way of example:

- Adequacy decisions of the European Commission (if the third country is recognized as adequate);
- Standard Contractual Clauses (SCCs) approved by the European Commission, supplemented by any additional measures necessary to ensure a level of protection essentially equivalent to that guaranteed by the GDPR.

You may obtain information on the place where your Personal Data have been transferred by writing to info@cosulich.it.

8. Data Retention Period

Your Personal Data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed, and in any case according to the following time limits:

- **For applications to specific positions (Purposes 1 and 2):** your Personal Data will be retained for the time strictly necessary to complete the selection process for the position for which you applied and, in any case, for a period not exceeding 12 months from the closing of the position or from receipt of your application, unless an employment relationship is established.
- **For spontaneous applications (Purpose 2):** your Personal Data will be retained for a maximum period of 12 months from the date of receipt, in order to consider your profile for



future opportunities within the Fratelli Cosulich Group. At the end of this period, your data will be deleted or anonymized.

- **For processing carried out to comply with legal obligations (Purpose 3):** your Personal Data will be retained on the basis of the specific legal obligations to which we are subject.

9. Data Subject Rights

As a data subject, you are entitled to the following rights in relation to the processing of your Personal Data, as provided for by the GDPR. You may exercise these rights by contacting Fratelli Cosulich S.p.A. using the contact details indicated above in section 1 of this privacy notice, which acts as the contact point for handling data subjects' requests also in the event of joint controllership with one or more Fratelli Cosulich Group companies, without prejudice to your right to exercise your rights against each of the joint controllers.

- **Right of access (Art. 15 GDPR):** obtain confirmation as to whether or not Personal Data concerning you are being processed and, where that is the case, access to the data and information relating to the processing.
- **Right to rectification (Art. 16 GDPR):** obtain the rectification of inaccurate Personal Data concerning you without undue delay, or the completion of incomplete Personal Data.
- **Right to erasure (Art. 17 GDPR – right to be forgotten):** obtain the erasure of Personal Data concerning you without undue delay, where the grounds provided by the GDPR apply.
- **Right to restriction of processing (Art. 18 GDPR):** obtain restriction of processing where one of the conditions set out in the GDPR applies.
- **Right to data portability (Art. 20 GDPR):** receive the Personal Data concerning you, which you have provided to the Controller or Joint Controllers, in a structured, commonly used and machine-readable format and, where technically feasible, transmit them to another controller.
- **Right to lodge a complaint (Art. 77 GDPR):** lodge a complaint with the Italian Data Protection Authority (Piazza Venezia no. 11 - 00187 Rome - www.garanteprivacy.it) if you believe that the processing of your data violates the GDPR.

10. Changes to this Privacy Notice

This privacy notice may be amended or updated in the future, including as a result of changes in the applicable legislation. Where the changes to this privacy notice concern substantial changes to the processing or may in any case have a significant impact on data subjects, Fratelli Cosulich S.p.A. will take care to inform data subjects appropriately. We invite you to consult it periodically in order to remain informed about our data protection practices.