



**Green Oleo s.p.a. - PRIVACY POLICY FOR CANDIDATES AND EMPLOYEES - TRAINEES**

<p><b>Data Controller</b></p>	<p>Green Oleo s.p.a., with registered office at via Bergamo no. 66, Cremona (“<b>Controller</b>”), in its capacity as data controller pursuant to Art. 4(1) no. 7 of Regulation (EU) 2016/679 (“<b>GDPR</b>”), provides the following information on the processing of your personal data (“<b>Data Subject</b>”). This information applies to personal data provided by candidates in the course of the selection process and by employees of the Controller in the course of their employment.</p> <p>For any information and/or query related to this policy and/or the processing indicated herein, the Data Subject may contact the Controller at any time, by sending a registered letter with return receipt to the Controller's registered office or an e-mail to <a href="mailto:privacy@greenoleo.com">privacy@greenoleo.com</a>.</p>
<p><b>Categories of personal data processed</b></p>	<p>The Controller processes data known as <b>common data</b> provided by the Data Subject, such as personal and contact details (e.g. name, surname, tax code, address, telephone number, email address and other contact details), bank and social security data, details of identification documents, as well as data concerning the Data Subject’s working and professional life (e.g. data contained in CVs, such as professional experience, qualifications, jobs held, degrees).</p> <p>The Controller may also process location data on Data Subjects using certain company tools (i.e., company servers and networks, Citrix, PCs, laptops, smartphones, Telepass, Viacard, satellite antitheft devices, black boxes and/or audiovisual devices that may be installed on cars, badge access systems, company credit cards and company expense report management systems). Where such processing may result in the remote monitoring of Data Subjects, the Controller has entered into agreements with the relevant trade unions, which it undertakes to comply with and keep up to date at all times.</p> <p>The Controller processes any <b>special data</b> provided by the Data Subject, including data concerning the latter’s health (e.g. fitness for work, disability) and political orientation (e.g. membership of trade unions, political parties, elected public positions).</p>
<p><b>Purpose of processing and legal basis – measures taken at the request of the data subject and contract performance</b></p>	<p>The Data Subject provides his or her personal data for the selection process as well as for the possible establishment and performance of the employment relationship with the Controller and related activities (e.g. reimbursement of expenses, provision of training).</p> <p>The legal basis for data processing is the implementation of pre-contractual measures taken at the Data Subject's request as well as the performance of the contract between the Controller and the Data Subject. The provision of personal data is necessary for the establishment and performance of the contractual relationship; therefore, if such data are not provided, the Controller will be prevented from proceeding with the relationship.</p>
<p><b>Purpose of processing and legal basis – legal obligation</b></p>	<p>The Controller may process the personal data provided by the Data Subject to fulfil obligations arising from provisions of law, including Community law, as well as from rules, codes or procedures approved by public authorities, as well as following requests by public bodies.</p>



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	The legal basis for the processing is the fulfilment of a legal obligation to which the Controller is subject. The provision of personal data is necessary to enable the Controller to comply with these legal obligations and, therefore, if such data are not provided, the Controller will be prevented from carrying out the relationship and meeting its related obligations.
<b>Purpose of processing and legal basis – <i>legitimate interest</i></b>	The Controller may process the personal data provided by the Data Subject for the establishment, exercise or defence of legal claims.
	The legal basis for the processing is the legitimate interest of the Controller. The provision of personal data is necessary for the establishment and performance of the contractual relationship; therefore, if such data are not provided, the Controller will be prevented from proceeding with the relationship.
<b>Purpose of processing and legal basis – <i>employment and social security and social protection law</i></b>	The Controller may process the special data provided by the Data Subject for the application of occupational health and safety laws as well as for purposes connected with the management of trade union obligations or connected with electoral legislation.
	The legal basis for the processing is the fulfilment of the Controller's obligations and the exercise of its specific rights in the field of employment and social security and social protection law.
<b>Processing methods</b>	The personal data provided by the Data Subject are processed, within the limits of the achievement of the purposes set out above and for the storage periods indicated herein, by automated and manual means, on electronic and/or paper media owned by the Controller or by third parties, in compliance with the principles of lawfulness, fairness and transparency, data minimisation and the rules of confidentiality, integrity and security provided for by law, by the consequent regulations and by specific internal provisions. In addition, the Controller has implemented appropriate technical, physical and organisational measures to protect personal data and to avoid and/or mitigate the consequences of any breaches.
<b>Data disclosure</b>	<p>The Data Subject's personal data will not be disseminated. The personal data provided by the Data Subject may be disclosed to third parties - though only for the aforementioned purposes and for the storage periods indicated herein - such as: public administrations (e.g., public bodies, police forces); suppliers and consultants (e.g., IT suppliers, accountant, payroll consultant, personnel training company); customers and business partners for requirements connected with performance of the employment relationship. Such third parties will act either as independent data controllers or as data processors (in which case, the Controller will appoint them in writing and give them instructions on personal data processing). A complete list of the data processors appointed by the Controller can be easily and freely obtained by sending a request to the Controller.</p> <p>In addition, the personal data of the Data Subject will be processed by certain employees of the Controller, who have been formally appointed as data processors and adequately instructed to process personal data exclusively for the purposes set out herein.</p>
<b>Transfer of data</b>	The Data Subject's personal data will not be transferred to countries outside the EEA. In any event, should such a transfer be necessary, in the absence of an adequacy decision, the Controller will adopt



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	appropriate safeguards under the GDPR to ensure an adequate level of protection for the personal data transferred. The Data Subject may obtain a copy of such safeguards.
<b>Data storage</b>	Personal data are stored and processed on computer and/or paper media owned by the Controller or third-party technical service providers. Personal data will only be kept for as long as necessary for the purposes for which they were collected and, in any case, will be deleted within five years from termination of the relationship with the Controller.
<b>Rights of the Data Subject</b>	<p>By contacting the Controller as indicated in this policy, the data subject may: obtain confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, obtain information as to the purposes of the processing, the storage period and the persons to whom the data are disclosed (so-called right of access – Art. 15 GDPR); obtain the rectification, updating or integration of personal data concerning the Data Subject (so-called right to rectification – Art. 16 GDPR); obtain the erasure of personal data concerning him/her (so-called right to erasure – Art. 17 GDPR) or restriction of processing (so-called right to restriction – Art. 18 GDPR), if the conditions are met; receive in a commonly used, machine-readable and interoperable format the personal data concerning the Data Subject (so-called right to data portability – Art. 20 GDPR); object to processing by the Controller, where the legal conditions are met (so-called right to object – Art. 21 GDPR).</p> <p>The data subject may also apply to the Data Protection Authority (<a href="http://www.garanteprivacy.it">www.garanteprivacy.it</a>) with headquarters at Piazza Venezia no. 11, 00187 - Rome, in order to enforce his or her rights in relation to personal data processing.</p>

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