



Riva Acciaio Privacy Information CANDIDATES

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PRIVACY INFORMATION IN ACCORDANCE WITH ART. 13 EU REGULATION No 679/2016

Riva Acciaio S.p.A., pursuant to EU Regulation 679/2016 applicable from 25th May 2018 – General Regulation on Data Protection (“GDPR”) – and in accordance to Legislative Decree no. 196/2003 – Personal Data Protection Code (“Privacy Code”) – as amended by Legislative Decree 101/18 (hereinafter the Privacy Code and GDPR are collectively referred to as “Applicable Law”) recognizes the importance of protecting Personal Data and considers their protection one of the main objectives of its activities.

In accordance with the Applicable Law, we provide you with the necessary information regarding the processing of the Personal Data submitted by you. This information is provided in accordance with art. 13 of the Applicable Law and Riva Acciaio S.p.A. invites you to read it carefully as it contains important information on the protection of Personal Data and on the security measures adopted to guarantee their confidentiality in full compliance with the Applicable Law.

Riva Acciaio S.p.A. informs that the processing of Personal Data will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, adequacy, minimization of data, accuracy, integrity, and confidentiality. Personal Data will therefore be processed in accordance with the legal provisions of the Applicable Law and the confidentiality obligations provided for therein.

In view of the above, in accordance with articles 6, 7, 9 and 13 of the GDPR, we inform you of the following:

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is the company Riva Acciaio S.p.A. (“Data Controller”) with registered office in Milan, Viale Certosa 249, tel. 02307001, e-mail address privacyitalia.ra@rivagroup.com. Riva Acciaio S.p.A. has appointed GetSolution di Paola Generali, with registered office in Via Fabio Filzi, 23, 20124 Milan, tel. 0239661701, e-mail address dpo-grupporiva@getsolution.it, as Data Protection Officer (DPO), available for any information regarding the processing of Personal Data carried out by the Data Controller.

2. PERSONAL DATA SUBJECT TO PROCESSING

Following your filling of the form in the Job Portal of our website or following Riva Acciaio S.p.A.’s receipt of your application and curriculum vitae, the Data Controller may process the following categories of data:

- A. Personal and curricular data (such as identification data, contact details, professional profile, work experience or personal interests, including pictures or a cover letter);
- B. Personal data: such as name, surname, e-mail address, phone number.

The Data Controller invites you not to provide, through your CV, the Personal Data falling within the special category regulated by art. 9 of EU Regulation no. 679/2016 (such as, by way of example, data suitable for detecting the belonging to protected categories) if it is not strictly necessary for the purposes of the processing. In any case, the Data Controller processes such data only for the purpose of assessing the professional aptitude of the Data Subject, to the extent that the acquisition of such information is strictly necessary for the establishment of the employment relationship/collaboration.

3. PURPOSES AND LAWFULNESS OF PROCESSING

The Personal Data will be used only for the specific purposes and, in any case, always on a consistent legal basis of processing.

The purposes and legal basis are described below.

PURPOSES OF PROCESSING	LAWFULNESS OF PROCESSING	PERSONAL DATA
Research, selection and evaluation of the Candidate for possible recruitment.	The implementation of pre-contractual measures on request of the Data Subject. For any Particular Data provided (for the recruitment of protected categories), the need to fulfill obligations or exercise rights under applicable labor laws (pursuant to Article 9 paragraph 2, letter b) of the GDPR).	A
Selection and evaluation for future vacant positions, as well as for sharing the candidate's profile with one or more Riva Group companies.	The legitimate interest of the Data Controller pursuant to art. 6 lett. f)	A
The implementation of an exclusion list of Candidates with whom, for reasonable grounds, the Data Controller precludes himself from forming future contractual relationships on the basis of criteria that reflect objective conduct of a certain gravity (for example: the submission of false and/or mendacious documentation during the selection process; aggressive and/or offensive conduct towards the HR function; spontaneous declarations contrary to the Company's ethical/moral principles; the failure by the Candidate to take up the vacant job position after signing the job offer).	The legitimate interest of the Data Controller pursuant to art. 6 lett. f)	B

4. NATURE OF THE PROCESSING

The provision of data is optional. However, any total or partial refusal to provide the requested information may make it impossible for Riva Acciaio S.p.A. to take your candidacy into consideration and/or to adequately evaluate your professional profile.

5. WAY OF THE PROCESSING

The processing may be carried out manually or with the aid of electronic and automated means, and will take place at the aforementioned registered office of the Data Controller, at its operational offices or at identified third parties and will include, in compliance with the limits and conditions set forth by art. 5 and 25 of the GDPR, all the operations provided for in art. 4 paragraph 1 no. 2) of the GDPR necessary for the processing in question, including the communication to the subjects referred to in the following point.

6. SCOPE OF COMMUNICATION AND RECIPIENTS

The Personal Data provided may be shared, for the purposes specified above, with:

- persons authorized by Riva Acciaio S.p.A. for the processing of Personal Data who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators of Riva Acciaio S.p.A.);
- external entities providing services for the management and/or maintenance of the information system and telecommunications networks (including e-mail and/or web platforms) operating as authorized or processors. These subjects act as Data Processors. The list of Data Processors is constantly updated and available at the registered office of the Data Controller.

Recipients not included in the list will process Personal Data as independent Data Controllers and will be subject to the relevant obligations.

We also inform you that the processing of Personal Data is carried out in a system of joint control between Riva Acciaio S.p.A. and Riva Forni Elettrici S.p.A. The parties have determined their respective responsibilities regarding compliance with the obligations deriving from the GDPR, in a transparent way through an internal agreement stipulated pursuant to art. 26 of the GDPR. In particular, the parties agree that the respective areas of control concern the processing of employees' data in compliance with the purposes of: human resource management; management of ICTI systems; secretarial management and access control.

7. PERSONAL DATA TRANSFER OUTSIDE THE EU

The Data Controller does not directly carry out any data transfer outside the European Union. However, by using cloud services, chosen since it guarantees adequate and appropriate security measures to protect personal data, a transfer of data outside the EEA is possible due to technical and maintenance reasons, by means of the following guarantees, ensured by the supplier:

- transfer of data to countries deemed to be adequate by the EU Commission;
- subscription of Standard Contractual Clauses for the transfer of data outside the EU, as defined by the EU Commission, in order to guarantee a safe and legitimate transfer and subsequent processing of data outside the EU.



8. DATA RETENTION

The processing of personal data under point A) will have a duration coinciding with the time necessary to complete the purposes indicated in this information and in any case up to 12 months from the completion of the registration form or from the receipt of the curriculum vitae.

We also inform you that, upon expiration of the retention period, you will be notified by e-mail of the possibility of keeping your Account active beyond the established deadline, with a view to being able to access future selections or vacancies on the Job Portal. This possibility is part of your free manifestation of will, expressed by accessing and updating your profile at the expiry of the retention period, otherwise we will proceed with the definitive deletion of your personal data.

The processing of personal data under point B) will have a duration coinciding with the time necessary to complete the purposes indicated in this information and in any case up to 24 months from the existence of concrete and specific reasons reflecting objective conduct capable of justifying the Candidate's inclusion in the exclusion list. The aforementioned term may be extended up to 5 years only and exclusively in cases of objective conduct of considerable gravity.

Once the purposes have been pursued, if necessary, the data may continue to be processed for the period provided for by regulatory provisions or until the limitation period for asserting a right connected with the same, until the time limit for appeals has expired.

9. RIGHTS OF DATA SUBJECTS

Within the limits of Applicable Law, as a Data Subject, you have the right to request at any time from Riva Acciaio S.p.A. the access to your Personal Data, the rectification or erasure thereof and to limit or object to the processing of your Personal Data.

Requests must be sent via e-mail to the following address: privacyitalia.ra@rivagroup.com

As a Data Subject, you have the right to lodge a complaint with the competent supervisory authority (Personal Data Protection Authority) if you believe that the processing of your Personal Data is contrary to current legislation.

THE DATA CONTROLLER
RIVA ACCIAIO S.p.A.



Riva Acciaio S.p.A.

Company with sole shareholder subject to management
and coordination by Riva Forni Elettrici S.p.A.
Share Capital € 115.830.000,00

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