

PRIVACY POLICY

*pursuant to Art. 13 and 14 of EU Regulation 679/2016 and applicable privacy provisions
interns and work-study trainees*

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data ("**Regulation**") and any other EU or national provision and/or regulation applicable to the protection of personal data, **TECON S.R.L.**, Strada 1 Palazzo CC 20057 Assago (MI), e-mail: tecon@teconsrl.it; tel. 0292882150, as Controller ("**Company**" or "**Controller**"), informs you that the personal data ("**Data**") provided by you during the selection, establishment and management of the internship or work-study traineeship, or otherwise acquired as part of our Company's activities, may be processed in compliance with the following.

In the case of minors, this Privacy Policy shall be understood to be addressed to them through the people exercising parental responsibility.

1. Categories of personal data processed

The information that the Company may process, within the limits of the purposes and methods described in this Privacy Policy, may be considered as "Common Personal Data", which includes your personal information or that of the person exercising parental responsibility, bank details, tax information, contact details (such as, for example, mobile phone number; e-mail address). Hereinafter jointly referred to as "**Data**".

2. Purpose and legal basis of processing, nature of data provision

Below is an explanation of the purposes for which your Data is processed, as well as the legal basis underpinning the processing thereof.

The Company processes the Data for the following purposes:

- a) management and execution of the internship or work-study traineeship between you and our Company;
- b) purposes related to the management of your work activity (e.g. allocation of tools for rendering work services), the implementation of any training activities, as well as the management of your professional growth;
The legal basis for the processing of Data aimed at pursuing the above purposes is the execution and proper management of the employment contract entered by you and the Company.
- c) Fulfilment of tax and accounting obligations, including those towards the State financial administration.
The legal basis for the processing of Data for this purpose is the fulfilment of the fiscal and accounting obligations established by the law.
- d) Fulfilment of obligations arising from the conclusion of insurance contracts (both mandatory and contractual insurance);
The legal basis for the processing of Data for this purpose is represented by the need of the Controller to comply with legal obligations (necessary for compulsory insurance requirements), as well as to fulfil the data subject's intention to take out an insurance policy under the contract.
- e) Purposes related to proper personnel management and workplace safety, including the implementation of employee identification (e.g., badges) and attendance and access recording tools;
The legal basis for the processing of Data for this purpose is represented by the need to process the data based on the contract to which the data subject is a party, as well as the pursuit of the legitimate interest of the Controller in ensuring the safety of the workplace, which, based on the assessments made by the Company, does not adversely affect your rights.
- f) Organisational, production and safety purposes, as well as for the purpose of protecting the company's information/computer assets, for the prevention of offences also through the use of control systems concerning the correct use of the computer tools available to employees;

- g) ensure the protection of the Controller's premises and corporate assets, including the implementation of a video surveillance system;
- h) the management of disputes in the event of breaches, claims, litigation, and/or settlements.
The legal basis for the processing of the Data for the purposes illustrated above is the pursuit of a legitimate interest of the Controller and/or third parties (e.g. in the event of litigation, protection of company assets), which, based on the assessments made by the Company, does not adversely affect your rights.
- i) Purposes connected with the fulfilment of legal obligations, regulations, national and EU legislation and provisions issued by authorities empowered to do so (e.g. health and safety at work, equality, and diversity, etc.).
The legal basis for the processing of Data for this purpose is the fulfilment of the obligations established by the law and applicable regulations.
- j) Allocation of additional company benefits and services in your favour, including through other Group companies (e.g., canteen services).
The legal basis for the processing of Data for this purpose is the allocation and proper management of company benefits.

3. Data processing mode

The Data shall be processed using manual, computerised or telematic means, suitable to guarantee security and confidentiality, and shall be carried out by personnel duly instructed in compliance with the relevant legislation and formally entrusted with the processing of the Data.

4. Scope of Disclosure of Personal Data - Dissemination

For accounting purposes and the application of relevant industry rules, your Data may be communicated to (i) third parties who provide services related to the Company's business (e.g. insurance companies, debt collection, IT/computer services, consultancy, professional firms and accounting, legal, administrative and management consultants) and with whom specific agreements have been signed in accordance with the Regulation; and (ii) Group companies; (iii) public bodies, including those responsible for managing internships (e.g. universities) or work-study traineeships (e.g. schools).

These persons/entities may be established in EU and non-EU countries. If these entities are established in non-EU countries, the Company shall adopt the measures provided for in the Regulation to legitimise the transfer of personal data to them.

The list of people/entities to whom the data is or may be disclosed, as well as an indication of the privacy measures adopted to legitimise the transfer of data to extra-EU entities, may be requested from the Company by contacting the addresses indicated in 'the 'Data subjects' rights' section.

The Data may also be brought to the attention of our personnel who will process it in their capacity as processors.

5. Data retention period (criteria for determination)

Information related to the contractual relationship will be kept for the duration of the relationship. In the event of termination, for any reason whatsoever, the Company may keep the aforementioned documents for the next 10 years, in accordance with the period established in article 2946 of the Italian Civil Code, starting from the date of termination. This is without prejudice to the provisions of Articles 2220 et seq. of the Italian Civil Code, which stipulate that accounting records (together with invoices, correspondence, and related documents) must be kept for 10 years from the date of their last entry. Data collected through the video surveillance system will be retained for 72 hours from the time of collection and then deleted, unless further retention is necessary for purposes related to the right of defence of the Company or third parties.

6. Rights to which you are entitled

We hereby inform you that pursuant to the Regulation - at any time and free of charge and without any special formalities and fees - and within the limits and exclusions contained therein, you will have the right to:

- obtain confirmation of the processing by the Controller;

- access your personal data and know its origin, the purposes of the processing, the data of the people/entities to whom they are disclosed, the period of retention of your data or the criteria used to determine it;
- update or rectify your personal data so that it is always accurate and correct;
- delete your personal data ('right to be forgotten') from the databases and/or archives, including those of the Controller's backup, if, among others, it is no longer necessary for the purposes of the processing or if this is assumed to be unlawful, and provided that the conditions laid down by law are met and, in any case, if the processing is not justified by another equally legitimate reason;
- restrict the processing of your personal data in certain circumstances, for example where you have questioned its accuracy, for the period necessary for the Controller to do the relative checks. The Controller must also inform, in reasonable time, when the period of suspension has ended or the cause of the restriction of processing no longer exists and therefore the withdrawal of the restriction;
- obtain your personal data (so-called "portability") if received and/or processed by the Controller with your consent and/or if its processing is carried out based on a contract and with automated tools, in electronic format and in order to transmit it to another controller.

The Controller must do so without delay and in any case within one month of receipt of your request at the latest. The time limit may be extended by two months, if necessary, taking into account the complexity and the number of requests received by the Controller. In such cases, the Controller will inform you of the reasons for the extension within one month of receipt of your request.

The above-mentioned rights may be exercised by means of a written request addressed, without formalities, to the Company at the contacts indicated in point 1; at the following e-mail address tecon@teconsrl.it.

The Company reminds you that, should you not be satisfied with the response to your request, you may contact and lodge a complaint with the Italian Data Protection Authority (<http://www.garanteprivacy.it/>) in the manner provided for by the Regulation and by the operating procedures indicated on the said website.

7. Policy update

This policy was updated in May 2024.

The Controller

Tecon S.r.l.