

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES

pursuant to Articles 12, 13 and 14 of Regulation (EU) 2016/679

The company **A.C.E.M. S.R.L.** (hereinafter, the “Data Controller”), Tax Code and VAT no. 02471740163, in the person of its legal representative, Mr. Gianpaolo Mandaletti, with registered office in Grassobbio (BG), Via XXV Aprile no. 36, in its capacity as “Data Controller”, hereby informs you that your personal data collected for personnel selection purposes (employee, contractor, intern, apprentice, etc.) for A.C.E.M. S.R.L. will be processed in compliance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as with applicable legislative and contractual provisions, for the purposes and according to the modalities set out below.

Origin and type of data processed

The processing of your personal data, whether directly provided by you (via email, on paper, or through the dedicated form on the company website), or acquired from third parties entrusted with the selection activity (headhunting companies, specialized recruiting websites), is carried out by A.C.E.M. S.R.L. for the purpose of identifying potential candidates with whom to establish a working relationship, in the forms and modalities deemed appropriate, in compliance with applicable legal obligations.

Such processing concerns:

- a) **personal identification and contact data**, as well as information relating to your educational background (e.g. name, date and place of birth, home address, tax code, gender, phone number, email address, academic qualifications, training courses, etc.);
- b) **data relating to previous and current professional and/or work experience**, foreign language skills, and any further information useful for assessing your CV, including salary levels, etc.;
- c) **data from public sources**, such as websites, newspapers and magazines (including specialized publications), scientific publications or other publicly accessible written materials, as well as recruiting websites as part of the selection process;
- d) **public data relating to your professional social network profiles** (e.g., information available on your public LinkedIn profile);
- e) **any other data voluntarily included in your CV** or provided to third-party recruiters;
- f) **data collected from third parties** regarding your previous work experiences.

Some of the above data may include categories of information considered “special categories of personal data” or data relating to criminal convictions and offences.

Candidates are invited not to include or otherwise communicate personal data revealing racial or ethnic origin, religious, philosophical or other beliefs, political opinions, trade union membership, associations or organizations of religious, philosophical, political or trade union nature, as well as data concerning health or sexual life (special categories of data).

However, special categories of personal data may be processed if one of the legal bases under Article 9(2) GDPR applies. In particular, health-related data such as membership in protected categories may be processed if contained in the CV or in additional documentation received.

If you decide to apply, you are free to provide the personal data you deem appropriate. However, failure to provide the personal data necessary to identify you (e.g., personal details, educational background, competencies required for the position for which you are applying) will prevent A.C.E.M. S.R.L. from considering your application, as such data are essential for this purpose.

Legal basis and purposes of the processing

Your personal data, whether requested or acquired before or during the selection process, will be processed by the Data Controller for the following purposes:

- a) **managing activities related or instrumental to the assessment of your CV**, including scheduling and conducting selection interviews, also in interactive or group mode;
- b) **proposing your application to other companies collaborating with A.C.E.M. S.R.L.**. All criteria set forth by Legislative Decree 125/91 to ensure gender non-discrimination during selection will be applied;
- c) **obtaining references** from your previous employers;
- d) **processing publicly available information** regarding your professional social network profiles;
- e) **establishing, exercising, or defending the Data Controller’s rights** in judicial or extrajudicial proceedings.

For the purpose referred to under point a), your consent is not required since the processing is strictly necessary to follow up on your request and to acquire preliminary information for the possible establishment of a contractual relationship, or to comply with legal obligations to which the Data Controller is subject (Art. 6(1)(b) and (c) GDPR).

Special categories of data will only be processed if necessary and relevant, and only under the conditions set out by Art. 9 GDPR.

Your consent is required for the purposes referred to under points **b)** and **c)**, while processing related to point **d)** is based on the Data Controller's legitimate interest to verify the accuracy of the data provided, limited to professional information.

Communication and dissemination of data to third parties

Your data may be communicated to trusted external companies operating, for example, in personnel selection, competence assessment, and—where necessary—to healthcare organizations used by A.C.E.M. S.R.L. for technical, organizational, and candidate management purposes.

Your data may also be communicated to professionals, affiliates, subsidiaries, or related companies, as well as to companies, consortia, or other legal entities in which Mr. Gianpaolo Mandaletti participates as a partner and that may be interested in establishing an employment relationship with you. These parties will process your data as autonomous controllers.

Due to the coordination and management role performed by Mr. Gianpaolo Mandaletti, your data may be processed by authorized staff for administrative, financial, and organizational purposes carried out jointly among related companies.

Personal data will not be disseminated.

Candidates are invited to report any circumstances or events that may result in a potential personal data breach to allow A.C.E.M. S.R.L. to assess and promptly adopt appropriate actions. Such notification may be sent to: **amm@flymax.com**.

The Data Controller remains obliged to communicate data to Public Authorities upon specific request.

Transfer abroad

Personal data may be transferred to EU/EEA countries and, where necessary, to non-EU/EEA ("third") countries. When transfers to third countries occur, they will be made in accordance with Articles 44 et seq. GDPR, based on adequacy decisions, Standard Contractual Clauses, or applicable derogations. Only data necessary for the specified purposes will be transferred.

Processing methods and retention period

Data are collected and processed lawfully and fairly for the purposes indicated, using manual or electronic tools and ensuring appropriate security measures to prevent unauthorized access, loss, or unlawful processing.

Personal data will be retained:

- **for spontaneous applications:** 48 months, after which they will be deleted;

- **for applications responding to an active selection process:** for the period indicated in the selection notice, and in any case not exceeding 48 months from the end of the process.

Further retention may occur for the establishment, exercise, or defense of legal claims.

Nature of data provision and consent

For the purpose under point 1(a), processing is mandatory, and your consent is **not required**.

Providing consent for purposes under points 1(b) and 1(c) is **optional**, and consent may be revoked at any time.

Data subject rights

As a data subject, you may exercise the rights provided by Articles 15–22 GDPR, including:

- right of access;
- right to rectification;
- right to restriction and, where applicable, erasure;
- right to data portability;
- right to object at any time, including profiling based on legitimate interest;
- right to withdraw consent;
- right to lodge a complaint with the Italian Data Protection Authority.

Requests may be submitted via email to **amm@flymax.com** or via registered mail to the Controller's address.

Kind regards,

The Data Controller – A.C.E.M. S.R.L.

CONSENT STATEMENT

I, the undersigned _____ (name and surname),

declare that I have received and read the privacy notice pursuant to Articles 12–23 of Regulation (EU) 2016/679 provided by A.C.E.M. S.R.L.

and

☐ **authorize** ☐ **do not authorize**

the processing and potential communication to personnel selection companies engaged by A.C.E.M. S.R.L. of the special/sensitive data contained in my CV for the purposes under points 1(a) and (b).

☐ **authorize** ☐ **do not authorize**

the communication of my personal data, including special/sensitive data, to external companies for purposes connected to my application and the related selection process.

Place and date: _____

Signature of the Data Subject: _____