

PRIVACY NOTICE – JOB APPLICATIONS

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

1. Data Controller

The Data Controller is Polynt S.p.A., with registered office at Via Enrico Fermi n. 51, 24020 Scanzorosciate (BG), Italy, Tax Code and VAT No. 04902660960 (hereinafter, the “Controller”).

For any information regarding the processing of personal data, you may contact the Controller at: privacy@polynt.com

2. Purposes of Processing

The personal data that you may communicate during the application process for a spontaneous application or for a specific job offer on Polynt’s website/ others’ websites, or data contained in your Curriculum Vitae, will be processed for the following purposes:

- a) management of the recruitment and selection process, in relation to specific open positions or unsolicited applications;
- b) assessment of your professional profile, qualifications, and skills;
- c) management of pre-contractual activities, including the possible establishment of an employment relationship;
- d) possible sharing of your application with affiliated companies within the Polynt Group, strictly in relation to job opportunities at the location or legal entity to which your application refers.

3. Legal Basis for Processing

The processing of personal data (with reference to both common personal data and special categories of personal data) is based on:

- **Art. 6, par. 1, letter b) GDPR** (performance of pre-contractual measures taken at the request of the data subject);
- **Art. 6, par. 1, letter c) GDPR** (compliance with a legal obligation);
- **Art. 6, par. 1, letter f) GDPR** (legitimate interests pursued by the controller, including the right of defence);
- **Art. 9, par. 2, letter b) GDPR** (carrying out obligations and exercising specific rights in the field of employment and social security law).

Your consent is not required to process your data for recruitment purposes.

4. Categories of Personal Data

The Controller processes personal data contained in your Curriculum Vitae or however received through an unsolicited application, including:

- ordinary personal data, namely direct and indirect identification data, personal details and contact data;

- education, professional background, and skills.

With reference to special categories of personal data, namely data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and/or biometric data, as well as data concerning health or a person's sex life or sexual orientation, such data will be processed only where the specific application requires it. Candidates are therefore invited not to include special categories of personal data unless strictly necessary.

5. Nature of Data Provision

The provision of personal data is voluntary; however, failure to provide the data necessary for the evaluation process will make it impossible to assess your application.

6. Recipients of Personal Data

Your personal data may be disclosed to:

- internal authorized personnel of the Controller (e.g. personnel assigned to the Human Resources function, as well as personnel of the department concerned by the application);
- companies belonging to the Polynt Group, strictly for recruitment purposes and limited to job opportunities at the location or legal entity to which your application relates;
- third-party service providers also specialized in recruitment and personnel selection, duly appointed as data processors.

Data sharing within the Polynt Group is carried out in compliance with applicable data protection laws and is governed by specific intra-group data transfer agreements, designed to ensure an adequate level of protection of personal data.

7. Data Transfers

Personal data are primarily processed within the European Economic Area (EEA).

Where, for organizational or group-related purposes, it is necessary to transfer the data to third countries, such transfers shall take place in compliance with Articles 44 et seq. of GDPR.

In particular, transfers to Polynt Group affiliated companies located outside the EEA are governed by specific intra-group data transfer agreements, incorporating Standard Contractual Clauses approved by the European Commission or other appropriate safeguards under GDPR.

8. Source of Data

Personal data are collected:

- through the dedicated application portal available on the website www.polynt.com ;
- by means of electronic mail;

- directly from the data subject;
- from publicly accessible sources (e.g. professional online platforms such as LinkedIn);
- from recruitment agencies or third-party headhunters.

9. Data Retention

Your personal data will be retained for a maximum period of **12 months** from the date of receipt of your Curriculum Vitae or its latest update, unless otherwise required by applicable law.

10. Automated Decision-Making

Your personal data are not subject to automated decision-making processes pursuant to Article 22 GDPR.

11. Data Subject Rights

Pursuant to Articles 15–22 GDPR, you have the right to:

- access your personal data;
- request rectification or updating;
- request erasure;
- obtain restriction of processing;
- object to processing where applicable;
- receive your data in a structured, commonly used format (data portability);
- not be subject to decisions based solely on automated processing.

You also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

12. How to Exercise Your Rights

To exercise your rights, you may contact:

privacy@polynt.com