

PREAMBLE

With EU Regulation 679/2016, containing provisions for the protection of individuals with regard to the processing of personal data, GC GOVERNANCE CONSULTING Srl - with registered office in Via Vincenzo Monti, 15 - 20123 Milan / Via Frattina, 27 - 00187 Rome (hereinafter also referred to as the 'Organization' or the 'Company') as the Data Controller, is required to provide some information regarding the use of personal data. The Organization has appointed a Data Protection officer who can be contacted at the following e-mail address: dpo@governanceconsulting.com

SOURCE OF THE DATA AND THE TYPE OF DATA PROCESSED

The Data collected refers to the information generally contained in the Curriculum Vitae. In addition, information may be collected from a review of your references (if carried out) such as membership, academic background, relevant employment history in order to determine your eligibility as a candidate.

In addition to this, the information collected may also include data and images from your profile on professional networks, notes taken during interviews, whether in person or remotely, and comments from other parties such as contact persons, which may arise during the selection process.

The Data may be updated on the basis of publicly available information and/or information collected from third parties, and/or directly provided by the candidate.



The Company reserves the right to carry out appropriate checks on the truthfulness of the Data on previous work experience, assumption of professional positions or institutional positions, also by contacting the persons indicated by you as contact persons, as well as previous employers and any other person with whom the candidate has come into contact in the course of work.

The Data acquired will not concern personal convictions, trade union or political affiliation, political, religious or trade union opinions, sexual orientation, marital, family or pregnancy status, possible disability, race, ethnic origin, national origin, language group, state of health (unless this is a requirement of the law), any disputes with previous employers (hereinafter referred to as "Special categories of data"), as well as facts which are not relevant to the assessment of your professional aptitude, unless these are characteristics which affect the way in which you carry out your work or which constitute an essential and determining requirement for the performance of the work.

PERIOD OF DATA RETENTION

The Company bases its data processing on the principles of correctness, lawfulness and transparency. The processing may also be carried out by means of automated methods designed to store, manage and transmit them.

The processing will be carried out by means of suitable instruments to guarantee security and confidentiality through the use of suitable procedures to avoid the risk of loss, unauthorised access, illicit use and dissemination.



The Data will be stored in the company database for the period of time strictly necessary for the purposes and in any case, subject to your consent, for a period of time not exceeding 5 years from the date of acquisition by the Company. In case of data acquisition for internal research purposes, the maximum storage period will be 12 months.

After this period, the data will be deleted or made anonymous.

The Company provides for a periodical verification of the data and the possibility to delete them if they are no longer necessary/pertinent for the intended purposes.

CONFERMENT OF DATA AND CONSEQUENCES OF FAILURE TO CONFER

MANDATORY/NOT MANDATORY



The provision of data must be considered mandatory with regard to the necessary processing that the organization must carry out to meet the needs of knowledge and assessment of candidates in the search and selection of personnel to cover job positions, including possibly at client organizations around the world, as well as legal obligations, rules, regulations. Failure to provide such data may make it impossible for the organization to carry out the process of recruitment and selection of personnel.

The purposes for which it is mandatory to provide data are marked with the following symbol:



CONFERMENT OF DATA AND CONSEQUENCES OF FAILURE TO CONFER

MANDATORY/NOT MANDATORY



Consent is not mandatory for all other purposes and, even if given, can be revoked at any time by the person concerned.





The purposes for which it is NOT mandatory to provide data are marked with the following symbol:



PURPOSE OF DATA PROCESSING



The data are processed within the normal activity of the organization and for the following purposes. If the data controller intends to further process personal data for a purpose other than that for which they were collected, it will provide the data subject with all necessary information in advance and will request their consent where required.

-  Search for and selection of personnel with respect to the specific job vacancy for which the interested party has applied, to be placed within the organization or with client organizations, including through competitive procedures (including the phases of execution of administrative procedures and related investigations), including any related purposes;
-  Creation and management of the response to specific communications of the interested parties, management of administrative fulfilments, transposition and management of obligations provided for by national and Community laws, regulations and standards, as well as by provisions issued by authorities empowered to do so by law and by supervisory and control bodies, management of the response and in-depth examination of complaints or inefficiencies;
-  Recruitment and selection of personnel following an unsolicited application requested by the interested party for multiple positions considered by the Owner of potential interest without responding to a specific advertisement, including the related purposes;
-  Recruitment and future selection of personnel with respect to further multiple positions deemed by GC GOVERNANCE CONSULTING Srl to be of potential interest, including the related purposes of legitimate interest. Among the processing activities that will be carried out, aimed at the search and selection of personnel to be included also for future applications related to your profile, there is the storage in the database of GC Governance Consulting.

LEGAL BASIS FOR DATA PROCESSING









The data are processed for the above explicit purpose, not only on the basis of consent, but also in order to comply with a contractual/pre-contractual, legal, regulatory, regulatory, as well as instructions given by authorities legitimized to do so and by supervisory and control bodies. The explicit legislative references updated to their last state of revision, which provide for the obligations or fulfilments on the basis of which the processing of data (including sensitive and judicial data) may be carried out, are available and available for consultation at the Data Controller and in any case are part of current EU law and of the Member State to which the data controller is subject.

METHOD OF DATA PROCESSING



The processing of personal data is carried out by means of manual, computer and telematic tools with logic strictly related to the purposes themselves and in any case in such a way as to ensure the security and confidentiality of the data. The documentation is archived both electronically and on paper. Here are some essential information.

-  The collection of personal data is limited to the minimum necessary for each specific purpose of processing
-  The processing of personal data is limited to the purposes for which it was collected
-  The storage of personal data is limited to the minimum necessary for each specific purpose of the processing
-  Sensitive personal data that may be collected and processed in electronic format are stored in encrypted form
-  No personal data is provided to third parties for commercial purposes
-  The sale or rental of personal data is not carried out

SCOPE OF DISSEMINATION AND CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE DISCLOSED

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The personal data collected by the Company may also be communicated, within the limits strictly pertinent to the purposes indicated above, to the following subjects or categories of subjects. For all the purposes mentioned above, the communication of data also derives from a legal or contractual obligation or is a necessary requirement for the conclusion of a contract. In the absence of such communications, the relationship/contract may not be fully fulfilled.

The data will not be transferred to third countries outside the EU. The updated list of suppliers to whom data may be disclosed can be found by contacting the headquarters of the organisation.

- ✔ Subjects to whom the communication is required by law, by regulation or by national and Community legislation
- ✔ Clients who offer job positions considered of interest to the candidate (the communication could include the sending of the CV)
- ✔ Legal, accounting and employment consultants for the purpose of the firm and resolution of any problems related to possible employment (in the case of employment with the Owner)
- ✔ Organisations associated for purposes connected with relations with the organisation (e.g. parent and/or subsidiary companies)
- ✔ External organisations/subjects specialised in consultancy aimed at the recruitment and selection of personnel and the management of related administrative requirements
- ✔ National Labour Exchange
- ✔ IT Providers of services and solutions (e.g. providers of hosts, IT platforms that manage candidate data, etc.)

RIGHTS OF THE DATA SUBJECT



At any time, the interested party may exercise its rights against the Data Controller or Data Processor, pursuant to EU Regulation 679/2016, by contacting GC GOVERNANCE CONSULTING Srl at Dr. Lucio de Luca and Elena Miceli and Giovanna Pellegrino at the following addresses: governance@governanceconsulting.com - +39-02.7208981 - +39-02.7208 81 - Via Vincenzo Monti, 15 - 20123 Milano / Via Frattina, 27 - 00187 Roma (for written communications). In order to guarantee the correct exercise of the rights, the interested party must be unequivocally identifiable. The organization undertakes to provide feedback within 30 days and, if it is impossible to meet these deadlines, to justify any extension of the deadline. The response will be free of charge except in cases of unfoundedness (eg. there are no data concerning the applicant) or excessive requests (eg. repetitive over time) for which a fee may be charged not exceeding the costs actually incurred for the research carried out in the specific case. The rights relating to personal data concerning deceased persons may be exercised by those who have a personal interest or act to protect the person concerned or for family reasons worthy of protection. The data subject may also lodge a complaint with the supervisory authority.

In the event of a breach of personal data suffered by the organization, the owner will notify the competent supervisory authority of the breach within 72 hours of the event and will also notify the event to the person concerned, except in cases of exclusion provided for by law.

The interested party has the right to request: access, rectification, deletion of personal data, limitation of processing, and portability of data.

The interested party has the right to oppose: To the processing and revoke consent at any time without prejudice to the lawfulness of the processing based on the consent expressed prior to revocation. ALSO may lodge a complaint with the supervisory authority.

RIGHT TO OBTAIN INDICATION OF

- origin of personal data
- categories of data processed
- purposes and methods of treatment
- shelf life
- logic applied in case of processing carried out with the help of electronic instruments
- identification details of the Owner and Manager
- subjects and categories of subjects to whom the personal data may be communicated or

RIGHT TO OBTAIN

- confirmation of the existence or otherwise of their personal data and that such data are made available in intelligible form
- updating, rectification, data integration and limitation
- cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed unlawfully (including data whose retention is unnecessary for the purposes for which they were collected or subsequently processed)
- certification that the operations referred to above have been brought to the attention of those to whom the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly

who may learn about them as managers or agents in third countries

- existence of the profiling process

disproportionate to the right protected by the organization

- data portability (direct transmission from one holder to another)
- copy of the data being processed

RIGHT TO OBJECT

- the processing of personal data concerning the person concerned, including profiling for legitimate reasons, even if pertinent to the purpose of collection
- the processing of personal data concerning the person concerned for the purposes of: sending advertising material, direct selling, carrying out market research, commercial communications
- the processing of data processed for the purposes of scientific or historical research or for statistical purposes except in cases of public interest in the processing