

PRIVACY POLICY

in accordance with EU Regulation 2016/679 and Legislative Decree 196/2003

DETAILS OF THE REGISTERED OWNER

The data controller for your personal data is C90 ENGINEERING & CONSULTING SRL (VAT No. and Tax Code 17373931009), with its registered office in Rome, Via Fogliano 22, 00199 (Lazio)

DATA CATEGORIES

The processing of personal data by the Data Controller concerns personal data and data falling within the special categories referred to in Article 9 of the GDPR, which are strictly relevant to the obligations, duties and purposes associated with the management of work activities, and which cannot be fulfilled, on a case-by-case basis, through the processing of anonymous data or personal data of a different nature.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

The Data Controller processes your data, as identified above, in order to respond to your specific requests, or to initiate, pursue or conclude certain pre-contractual or contractual arrangements, or in any case to comply with legal obligations. It is also necessary to note that your data will be processed for the purposes of calculating and paying any amounts due; to comply with all legal, contractual and regulatory obligations towards social security and welfare institutions, including supplementary schemes, or towards the tax authorities; for organisational purposes, including in relation to the protection of property and persons; to fulfil or enforce the fulfilment of specific obligations or to carry out specific tasks required by EU legislation, laws, regulations or collective agreements.

Even outside the cases mentioned above, in accordance with the law for specific and legitimate purposes, for the purposes of maintaining accounts; to protect the life or physical integrity of the data subject or of a third party; to assert or defend a right, including on behalf of a third party, in court, as well as in administrative proceedings or in arbitration and conciliation proceedings in the cases provided for by law, by EU legislation, by regulations or by collective agreements. In particular, with regard to data relating to health and sexual life, the right to assert or defend such rights shall be at least equal to that of the data subject; for the exercise of the right of access to administrative documents, in accordance with the relevant laws and regulations; to fulfil obligations arising from insurance contracts intended to cover risks associated with the Data Controller's liability for damage caused to third parties in the course of their work or professional activities.

The legal basis for the processing of your personal and special categories of personal data pursuant to Article 9 of the GDPR, for the purposes outlined, is founded on the following grounds: the data subject's explicit consent to the processing; necessity for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures taken at the request of the data subject; necessity for compliance with a legal obligation to which the data controller is subject; necessity to protect

the vital interests of the data subject or of another natural person; necessity for the performance of a public interest task or a task carried out in the exercise of official authority vested in the data controller; necessity for the pursuit of the legitimate interests of the data controller or of a third party, provided that the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data do not override those interests, in particular where the data subject is a child.

METHODS OF PROCESSING

Your personal data will be processed in accordance with the relevant legislation, in order to ensure adequate security and confidentiality, including to prevent unauthorised access to or use of such data.

For this reason, your data will be processed and stored in accordance with the principles of necessity, data minimisation and storage limitation, using technical measures appropriate to the level of risk, for a period no longer than is necessary to achieve the purposes for which it is processed and, in any event, no longer than required by law.

Your data will be processed by the Data Controller, Joint Controllers, Data Processors (both internal and external) and, in any event, by persons authorised to carry out the relevant tasks, who are consistently identified, properly trained and made aware of the obligations imposed by the legislation on the protection of personal data. Processing will take place both on paper, using dedicated archives accessible only with express authorisation, and electronically, the latter via management systems (accessed with specific usernames and passwords) used for business operations, and backups. The processing of special categories of data is carried out solely using methods and forms of data organisation strictly related to the obligations, tasks or purposes set out above.

The data is usually collected by the data controller.

DATA RETENTION PERIOD AND METHODS OF DISPOSAL

Your personal data will be retained for no longer than is necessary to fulfil the obligations or tasks relating to the management of your employment file, and in any event for no longer than the period prescribed by law (five or ten years).

To this end, including through regular checks, we constantly verify that the data is strictly relevant and does not go beyond what is necessary in relation to the relationship, service or assignment in progress, to be established or that has ceased, including with regard to data provided by the data subject on their own initiative.

Any data which, even following verification, is found to be surplus to requirements, irrelevant or unnecessary shall be destroyed using physical destruction methods or data wiping techniques, except where the record or document containing such data is required to be retained in accordance with the law.

DISCLOSURE OF DATA TO THIRD PARTIES

Your personal data and special categories of personal data as defined in Articles 9 of the GDPR may, for purely functional, organisational, administrative, financial, accounting, pre-contractual and contractual

purposes, and in order to comply with legal obligations, be disclosed to the following parties: Social security bodies, INPS, INAIL, the Italian Revenue Agency, accountants, employment consultants, external collaborators, insurance companies, suppliers, supervisory and control bodies, judicial/administrative authorities, and other authorised public bodies.

In any case, the Data Controller may, without the need for express consent, disclose your data to the following categories of recipients: entities operating in the fields of electronic systems, support, consultancy, quality, financial and insurance services, auditing and certification. Entities to whom disclosure must be made to comply with requirements laid down by national and EU regulations, as well as provisions imposed by Supervisory and Control Bodies.

The Data Controller reserves the right, as provided for by the GDPR, to appoint Data Processors. The designation of such persons will be communicated to the data subject upon their express request via: registered letter with return receipt, ordinary post or certified email, as specified below.

TRANSFER TO A THIRD COUNTRY

Your personal data and special categories of data as defined in Article 9 of the GDPR will not be transferred to third countries unless you expressly request it.

MANDATORY NATURE OF THE PROVISION OF DATA

Should the Data Controller request the provision of your personal data, in particular the categories highlighted above (Article 9 of the GDPR), this is mandatory for the establishment, continuation and all other stages of the employment relationship, in accordance with the pre-contractual and contractual provisions between the parties, as well as with mandatory and non-derogable legal provisions.

Consequently, failure to provide the personal data described above in relation to the processing stages indicated, which may be required from time to time, will make it impossible to carry out any part of the work.

RIGHTS OF THE DATA SUBJECT

With regard to the processing of their data, the data subject, pursuant to Article 7 of Legislative Decree 196/2003 and Articles 13 to 22 of the GDPR, has the right to obtain from the data controller: confirmation as to whether or not personal data concerning them are being processed; information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the retention period; the rectification and erasure of the data; to have processing restricted; to have data portability, i.e. to receive the data from a data controller in a structured, commonly used and machine-readable format, and to transmit it to another data controller without hindrance; to object to processing at any time; object to automated decision-making relating to natural persons, including profiling; request from the data controller access to personal data and the rectification or erasure of such data, or the restriction of processing thereof, or to object to their processing, in addition to the right to data portability; withdraw consent at any time without affecting the lawfulness of processing based on consent given prior to

withdrawal; lodge a complaint with the supervisory authority.

AUTOMATED PROCESSES

The Data Controller does not use automated decision-making processes, including profiling, as defined by EU Regulation 2016/679 as any form of automated processing of personal data, consisting of the use of such personal data to evaluate certain personal aspects relating to a natural person. In particular, analysing or predicting aspects relating to the professional performance, financial situation, health, personal preferences, interests, reliability, behaviour, location or movements of that natural person.

Where such processing takes place, it is carried out using human decision-making processes rather than automated ones.

HOW TO EXERCISE YOUR RIGHTS

In order to enable you to exercise your rights, you may do so at any time by sending a message to the following contact details:

Registered letter with return receipt to the following address: - Via Fogliano 22 – 00199 Rome

Email: info@c90.it

Certified email: c90@pec.it