

COMPLETE PRIVACY INFORMATION - EMPLOYEES AND COLLABORATORS

In accordance with article 13 of Regulation 679/2016 regarding the protection of personal data we are responsible for providing you with some information relating to the treatment of your personal data in the context of your employment/collaboration relationship with SDAG.

The Data Controller is "SDAG SpA a Socio Unico" (headquartered: Stazione Confinaria S. Andrea, 34170 Gorizia), the contact details of a Data Protection Officer (DPO) are easily found on the Data Controller's website (www.sdag.it).

PURPOSE AND LEGAL BASIS OF THE PROCESSING

We will process your personal data for purposes connected and instrumental to the processing of the employment relationship. In particular for the following mandatory purposes

- 1. Fulfill the obligations arising from the employment contract
- **2.** Manage labor law, fiscal, welfare, contributory and remuneration aspects of the employment relationship
- **3.** Manage various permits and leaves (maternity and paternity leave for disabled assistance Law 104/92, for training, for political, trade union offices, etc.), grant periods of leave (for personal family reasons, etc.)
- 4. Guarantee safety and health in the workplace (Legislative Decree 81/08), through assessments of total or partial absolute unsuitability for work/profitable work/tasks, assessments of occupational disease, recognition of economic benefits to those entitled (also through the Competent Doctor)
- 5. Manage organizational and production needs, for workplace safety and for the protection of the Company's assets, also in relation to the video surveillance system and the electronic tools provided to provide work performance pursuant to art. 4 paragraph III L. 300/70 (PCs, smartphones, information systems, Internet, e-mail). The Regulation on the use of IT tools and video surveillance information are available on the company noticeboard (this constitutes information on the legitimate interest of the Data Controller pursuant to art. 13 paragraph 1 letter D) GDPR
- **6.** Manage the archiving and conservation of data, information, communications, including electronic communications, and documents relating to the selection process and the working relationship
- **7.** For publication of documents and information in the Transparency section (Legislative Decree 33/13) and other publications on the website required by laws and regulations. Management of access requests, civic access, generalized access to documents.

These activities take place pursuant to Art. 6 paragraph 1 of the GDPR

- b) fulfillment of a contract
- c) processing necessary to fulfill a legal obligation to which the data controller is subject
- e) exercise of public powers
- f) processing necessary for the pursuit of the legitimate interest of the data controller

Other optional purposes, for which your explicit and separate consent is required.

8. Video recordings or photographs of the interested party or of the workplace for information purposes, company promotion, participation in extra-work projects through dissemination on media (website, company social network profiles, TV, Internet, paper material, books, etc.)



For this activity the legal basis of the processing pursuant to Art. 6 paragraph 1 of the GDPR a) - Consent (also required at the time of filming)

9. Allow free access to the protected areas of SDAG based on the detection and recognition of the license plate number.

DATA PROVISIONING

The requested data will be those strictly indispensable to establish and maintain the working relationship over time. The communication of personal data is mandatory to proceed with the selection phases and the signing and/or execution of the contract; therefore, the refusal or failure to provide, in whole or in part, the requested personal data (including ones related to the special categories - art. 9 and art. 10 of Regulation 679/2016) may make it impossible for the owner to carry out the stages mentioned above.

RECIPIENTS OF PERSONAL DATA

Your personal data may be sent to other subjects or general categories of subjects other than the Data Controller, such as

- **1.** IT companies: for management, maintenance, updating of the systems and software used by the Owner and video surveillance systems;
- Consultants, professionals, law firms, arbitrators, insurance companies, experts, brokers: for management of labor law, tax, welfare, contributory and remuneration aspects; judicial, extrajudicial and insurance activity in the event of accidents;
- 3. Control bodies for legal and fiscal audit activities;
- **4.** Safety manager, Company's doctor pursuant to Legislative Decree 81/08: for safety and health management in the workplace.
- 5. Other service companies: for management of dedicated corporate welfare projects;
- **6.** Individuals, upon request, for the management of requests for civic access and generalized access to documents;
- 7. Public authorities for management of Legislative Decree 33/2013 obligations
- **8.** Judicial authorities and/or law enforcement agencies to carry out investigative activities, including preliminary ones.

If the processing is not occasional, the external parties are appointed as external data controller pursuant to art. 28 GDPR.

The data will be processed, as well as manually, also through IT and telematic infrastructures with logic strictly related to the purposes; therefore, IT companies may be involved in the processing as suppliers of infrastructure, software and various services (for example maintenance services, hosting services, digital replacement storage services, SaaS-type cloud services).

TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Your personal data will not be disclosed in any way to bodies or organizations in non-EU countries except in cases provided for by law.

Any IT services used in data processing and based on cloud infrastructure guarantee consistency with the provisions of Regulation 679/2016.



DATA RETENTION PERIOD

Below we explain the period for which personal data will be stored or, if this is not possible, the criteria used to determine this period:

- **1.** Personal data and documents of the employment relationship (certificates, single employment register, etc.): As required by law
- Electronic communications sent and received from the organization's email address: Archived on a central mail server for the period indicated in the "Regulations for the use of IT tools", for purpose 5
- **3.** Log of IT activity carried out within the organization (login, logout, timestamp, navigation log): Archived for the period indicated in the "Regulations for the use of IT tools", for purpose 5
- **4.** Video surveillance data: 24 hours, except for rights protection needs and judicial authority requests, for purpose 5
- 5. The plate is on the whitelist until the end of the employment relationship.

Rights of the interested party

You are the owner of the rights provided by the articles 15, 16, 17, 18, and 21 Regulation 679/2016 which you can exercise by directly contacting the Data Controller.

Further information on the processing of your data is available on the institutional website, Privacy section.

Finally, we inform you that the communication of your personal data is a legal or contractual obligation or a necessary requirement for the conclusion of a contract, therefore you have the obligation to provide the personal data, because otherwise it may not be possible to manage the working relationship with the Company.

(INSERT IN CONTRACT)

For acknowledgment, received the information and consent to the processing of my personal data pursuant to art. 6, paragraph 1 letter. a) of Regulation 679/2016.

Date_____

Signature _____

With respect to the processing of personal data provided for in point n. 8 (acquisition of audio/video recordings, photographs of staff and workplaces during activities and their potential reproduction, publication, diffusion and by any means for information purposes, promotion of company activities).

I give my consent I do NOT give my consent



With respect to the processing provided for in point n. 9 - Allow free access to the protected areas of SDAG based on the detection and recognition of the license plate number.

I give my consent I do NOT give my consent

LICENSE PLATE NUMBER______

In case of granting consent, the undersigned declares that has nothing to claim, for any reason, based on the above and that irrevocably renounce any right, action or claim deriving from the above authorized

Date_____

Signature _____

For acknowledgment:

- O of the Regulation on the Use of IT Tools
- O of the Security Regulations on Data Processing
- O of the Company Code of Ethics

O other

Date_____

Signature _____