

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR JOB APPLICANTS

Pursuant to Articles 13 and 14 of EU Regulation 2016/679

This information is provided in compliance with the legislation on the protection of individuals with regard to the processing of personal data, as per EU Regulation 2016/679 (hereinafter referred to as the "Regulation or GDPR"), collected and processed as part of the selection and application management activities aimed at possible recruitment.

1. DATA CONTROLLER

Autonomous data controllers of the processing of personal data for the selection and management of applications falling within their competence are the following companies of the Autostrade Group:

- Autostrade per l'Italia S.p.A., Via A. Bergamini, 50, 00159, Rome; the Data Protection Officer (DPO), domiciled for this purpose at the Company, can be contacted at the following e-mail address: dpo@pec.autostrade.it;
- Ad Moving S.p.A., Via A. Bergamini, 50, 00159, Rome; the Data Protection Officer (DPO), domiciled for the purpose at the Company, can be contacted at the e-mail address dpo.admoving@pec.autostrade.it;
- Free To X S.r.l., Via A. Bergamini, 50, 00159, Rome; the Data Protection Officer (DPO), domiciled for this purpose at the Company, can be contacted at the e-mail address dpo.freetox@pec.autostrade.it;
- Giove Clear S.r.l., Via A. Bergamini, 50, 00159, Rome; the Data Protection Officer (DPO), domiciled for this purpose at the Company, can be contacted at the e-mail address dpo.gioveclear@pec.autostrade.it;
- Elgea S.p.A. Via A. Bergamini, 50, 00159, Rome; e-mail address: elgea@pec.autostrade.it;

(hereinafter referred to as 'Owners' for brevity)

2. TYPE OF DATA PROCESSED

Data and/or personal information ('Data'), which may be collected and processed, include:

"common data"

- Applicant's personal details and identification (name, surname, date and place of birth, address of residence and/or domicile, etc.)
- contact details of the Applicant (postal address, e-mail address, telephone number)
- photographic image in the Candidate's CV
- professional and study and/or work experiences in the Applicant's CV and/or in the "Informative Questionnaire";

may also be collected and processed:

- common, identifying data (degree of kinship or affinity) of the Applicant's family members or household members and their employment status, by filling in the "Informative Questionnaire" provided by the Owner to the Applicant at the Selection stage.

"data belonging to special categories pursuant to Article 9 GDPR".

- data concerning any enrolment in employment lists pursuant to Law 68/99 and/or certification of Specific Learning Disorder (DSA) Law no. 170/2010

The Data Controller will not process Data that are not strictly necessary for the purposes indicated in point 3 below.

3. PURPOSE OF PROCESSING AND LEGAL BASIS

All Data are processed in compliance with the provisions of the law for purposes connected and instrumental exclusively to the performance of selection and application management activities for the purpose of possible recruitment, in the interest of the Holders.

The data and information provided voluntarily by the interested party in the curriculum and, where possible, in the "Informative Questionnaire" will be processed in accordance with art. 111-bis of Legislative Decree 196/2003 as amended (Privacy Code) and any special data (ex art. 9 GDPR) relating to registration on employment lists pursuant to Law 68/99 and DSA certification pursuant to Law 170/2010.

Such Data will be processed in execution of pre-contractual measures and on the basis of legal provisions, pursuant to Article 6(1)(b) and (c) of the GDPR.

Furthermore, where applicable, in consideration of the information that the Data Subject may provide by filling in the sections "Relations with representatives of Public Institutions and Public Administration" and "Other Information" of the "Informative Questionnaire", the Data of third parties, indicated in point 2 above, will be processed on the basis of the assumption of the legitimate interest of the Data Controllers in the fulfilment of fulfilments connected to transparency and conflict of interest prevention obligations, provided for in the "Conflict of Interest Management Policy", which the Companies also apply with reference to candidate personnel, pursuant to art. 6, co. 1, lett. f) of the GDPR, and their failure or partial conferral will result in the impossibility for the Data Controllers to correctly implement all the fulfilments provided for in said policy ("Conflict of Interest Management Policy").

To this end, the Candidate confirms to the Data Controllers that he/she has duly informed them about the processing of their data and, where applicable, acquired the relevant authorisations, indemnifying the Data Controllers against any liability arising from the unlawful disclosure of data.

Without prejudice to the Data Subject's freedom to provide personal Data, please note that failure to provide such Data shall make it impossible for the Data Controller to consider the Data Subject's candidature in any personnel search and selection procedure, except for the photographic image, for the certification of Specific Learning Disorder (SLD), the failure to provide such Data shall not prevent the processing in question.

Failure to provide the Data falling under the special categories pursuant to Article 9 of the GDPR, referred to in point 2 above, with reference to the certification of Specific Learning Disorder (DSA) and registration on employment lists, pursuant to Law 68/99, may entail respectively

- the impossibility of making use of the appropriate assessment methods employed in the selection procedure in implementation of the aforementioned Law on "DSA", without, however, precluding the start or continuation of the selection process
- the impossibility of continuing the selection procedure only where the procedure is aimed at filling positions reserved for workers belonging to the categories indicated in Article 1 of Law no. 68/99.

4. SPECIAL CATEGORIES OF PERSONAL DATA

Also in compliance with the principle of minimisation, Candidates are requested not to provide data and information that are redundant and/or unnecessary with respect to the purposes of personnel search and

selection. Candidates are therefore requested not to indicate personal data belonging to special categories (relating in particular to health, religious beliefs and political opinions) other than those that may be required for the purposes of selection (registration on employment lists pursuant to Law 68/99 or DSA certification data); in this circumstance the Data Controllers shall refrain from using such information.

5. DATA PROCESSING METHODS AND SECURITY MEASURES

- Treatment modes

Data may be collected:

- directly by the Interested Party, also with the use of computerised tools such as the online management platform "Recruiting", used for the activation of the selection procedure (accessible at <https://career55.sapsf.eu/career?company=autostrade>), through the management of the applications submitted by the Candidate and the relevant documentation,
- by third parties that the Data Controllers may use for search and selection procedures, such as recruitment agencies, for the purposes set out in point 3 above.

In the context of the processing described, it is necessary to be aware of and retain the Candidate's data as well as to acquire any changes to such data, which the Candidate must communicate as soon as they occur.

The processing of personal data is carried out by means of the operations indicated in Article 4 no. 2) of the GDPR, namely: collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion, and destruction of data.

Personal data are also subject to electronic processing.

The Data will not be subject to fully automated processing as specified in Article 22 GDPR.

- Security Measures

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorised access. In particular, this data is encrypted using a security technology called Transport Layer Security (TLS) for data in transit and Advanced Encryption Standard (AES) for data residing on servers. TLS technology encrypts information before it is exchanged via the Internet, making it unintelligible to unauthorised parties and thus guaranteeing the confidentiality of the information transmitted.

6. PERSONAL DATA RETENTION PERIOD

Data will be stored for a period consistent with the stated purposes, in accordance with the principle of minimisation, pursuant to Article 5.1(c) GDPR.

In the event that the candidature is not considered suitable to fill the job positions open within the individual Companies, the Data may be retained by each Data Controller, to the extent of its competence, for a period not exceeding two years from the closure of the selection or from the last access to the on-line management platform "Recruiting" made by the Data Subject, in order to allow for the evaluation of the possible possibility of placement in other job positions.

If, on the other hand, the selection has a positive outcome resulting in employment with the individual Company, through the signing of an employment contract, the Data shall be kept in the Archives of the

individual Data Controller (or of its supplier as indicated in point 7 below) for a period of 10 years from the date of termination of the employment relationship.

7. CATEGORIES OF PERSONS TO WHOM DATA MAY BE DISCLOSED

Within Autostrade per l'Italia S.p.A., only the persons in charge of the processing by the Data Controller and authorised to carry out the processing operations within the scope of the aforementioned activities may become aware of the Personal Data provided.

The Data may be disclosed to third parties (parent/subsidiary companies involved or Third Party Companies), required to process the information always for the purposes related to the search and selection, referred to in paragraph 3 above, or IT service providers, which allow the operation and maintenance of the above-mentioned platform, required to process the data for the same purposes, which are, for this purpose, appointed "Data Processors" pursuant to Article 28 GDPR.

The activities of selection and management of applications relating to Candidates for employment with one of the Companies of Autostrade Group, indicated in point 1 above, are carried out, on behalf of such companies, by Autostrade per l'Italia S.p.A., with registered office in Via A. Bergamini, 50, 00159, Rome, appointed for this purpose as Data Processor, pursuant to Article 28 GDPR, by the Companies themselves.

The Data Controllers may communicate Personal Data to Autostrade Group companies based within the territory of the European Union, which will process them, in their capacity as autonomous Data Controllers, in the event that the data are communicated for the same purposes of research and selection of their own personnel, for the purposes of possible recruitment, guaranteeing their confidentiality and security.

The full list of persons appointed as Responsible Persons is available from the DPO.

In any event, personal data will not be disseminated.

8. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Data management and storage take place on servers of third party companies appointed as Data Processors. The servers on which the Data are stored are located in Italy and within the European Union. Personal Data are not transferred outside the European Union.

In any case, should the data be transferred to countries outside the European Community, even if only to move the location of the archives and servers, the Data Controllers will ensure that the existence of an adequacy decision by the European Commission will be verified, or appropriate data protection clauses will be prepared with any third party recipients. In any event, the Data will be processed in the interest of the Candidate.

9. RIGHTS OF THE DATA SUBJECT

Pursuant to the Regulation, the Data Subject has the right to access his or her own data, in particular to obtain at any time confirmation of the existence or non-existence of such data and to know its content, origin, geographical location, as well as to request a copy, pursuant to Articles 15-22 GDPR.

The Data Subject also has the right to verify the accuracy of the data or request that it be supplemented, updated, rectified, limited, erased, transformed into anonymous form or blocked if processed in breach of the law, as well as to object to its processing in any case. In the event that the right to object is exercised, the Data Controller reserves the right not to grant the request, and therefore to continue processing, in the event that there are compelling legitimate reasons to proceed with processing that prevail over the interests, rights and freedoms of the Data Subject.

In addition, the Data Subject has the right to request Data portability.

We also inform you that you may lodge a complaint pursuant to Article 57 letter f) GDPR with the Personal Data Protection Authority.

10. WAYS OF EXERCISING RIGHTS

In order to exercise the rights referred to in point 9, the Data Subject may contact the Data Protection Officer (DPO) of the Data Controller in charge of the processing, or directly to the Data Controller, if there is no DPO, at the address indicated in point 1 above, by filling in the appropriate Forms made available by the Data Controller on its website.

The time limit for replying to the data subject is thirty days, which may be extended by a further two months in cases of particular complexity; in such cases, the Controller shall provide at least one interim communication to the data subject within the thirty-day period.

The data subject may lodge a complaint with the Privacy Authority, which can be contacted at <http://www.garanteprivacy.it/>.