

INFORMATION – CURRICULUM VITAE

Pursuant to Legislative Decree No. 196 of June 30, 2003, and EU Regulation 2016/679

In relation to the personal data that KALAWAY S.R.L. (formerly ADM CAPITAL S.R.L. UNIPERSONALE), VAT No. 05154930282, with legal headquarters in Padua, at Via San Crispino 82, will acquire through the job application and attached curriculum, for which the aforementioned company is responsible for the correct use, we inform you as follows:

1. PURPOSE OF DATA PROCESSING

The data processing is aimed solely at managing personnel selection procedures, with the retention of data for a determined period to maintain a database useful for potential hiring. The processing is also aimed at any necessity arising from legal obligations and the defense of the rights of the Data Controller or third parties in judicial or equivalent proceedings.

2. METHODS AND LEGAL BASES OF PROCESSING

The processing may be carried out with or without the aid of electronic or automated tools. The processing is carried out by specifically appointed individuals under the supervision and according to the instructions of the Data Controller and/or the various specific appointed data processors. The legal basis for processing is found in the execution of pre-contractual measures pursuant to Article 6(b) of EU Regulation 2016/679 and Article 122 of Legislative Decree 196/2003. It is specified that, in any case and with particular attention to the data referred to in Article 9 of EU Regulation 2016/679, only data strictly relevant to the potential establishment of the employment relationship will be processed by the Data Controller, also taking into account the specific tasks and/or characteristics of the required professional profiles. If the curricula sent by candidates contain irrelevant data concerning the pursued purpose, the Data Controller will refrain from using such information.

3. PROVISION OF DATA

The provision of common personal data (regarding work/salary and banking relationships, performance of economic activities, tax code and personal identification numbers, name, address, contact details, etc.) as described in this information is optional but strictly necessary for performing the activities described in point 1. The provision of sensitive data or other personal information necessary solely concerning the selection of specific tasks and/or profiles is optional and will be requested by the Data Controller only for the selection of such tasks/professional profiles. In the absence of a legitimate request for cancellation/opposition,

the data will be retained, for the purposes stated above, for a period of 3 years from the delivery of this information. The data subject will be able to request the deletion of the data at any time, resulting in the immediate cessation of the processing of the provided data.

4. REFUSAL TO PROVIDE DATA

The provision of personal data as per point 3 is optional, but any refusal by the data subject, or incorrect communication of such data, will result in the inability to adequately fulfill the activities described in point 1 within the requested timeframes.

5. COMMUNICATION AND DISSEMINATION OF DATA

Personal data may be communicated for the purposes described in point 1 to consultants and independent professionals, even in an associated form and specifically appointed (for example, the DPO, IT consultant, law firm, etc.), external personnel selection companies, public/private entities for whom communication may be compulsory or necessary in compliance with legal obligations. Personal data are not subject to dissemination.

6. TRANSFER ABROAD

The transfer of data may be possible to non-EU countries, specifically the USA. This service is protected by standard contractual clauses pursuant to Article 46 of EU Regulation 2016/679, ISO 27018 certification, and included in the Data Privacy Framework.

7. RIGHTS OF THE DATA SUBJECT

Article 7 of the Code and EU Regulation 2016/679 grant the data subject specific rights, including the right to access their personal data and have them provided in an intelligible form; the data subject also has the right to obtain the update, rectification (if erroneous), integration (if incomplete), or cancellation of data (in case of unlawful processing), the portability of data (the right to receive or have the data transmitted to another controller in a structured, commonly used, and machine-readable format), withdrawal of consent (if the legal basis for processing), transformation into anonymous form, or blocking/restriction of data processed in violation of the law; the data subject has the right to object, for legitimate reasons, to the processing of data. With reference to the processing of provided data, if the Data Subject identifies any violations of privacy regulations, they have the right to lodge a complaint with the Data Protection Authority. The Data Subject can exercise their rights by requesting them from the Data Controller or the Data Protection Officer (DPO), including requesting specific forms and, if necessary, a complete list of the appointed processors.

8. DATA CONTROLLER AND D.P.O.

The Data Controller is KALAWAY S.R.L. (formerly ADM CAPITAL S.R.L. UNIPERSONALE), VAT No. 05154930282, with legal headquarters in Padua (35129 -PD), at Via San Crispino 82.

The Data Protection Officer (D.P.O.) is lawyer Stefano Rognini, VAT No. 04852330283 – PEC stefano.rognini@ordineavvocatipadova.it – email rognini@admassociati.it - located at Via San Crispino, 82, Padua (35129 -PD), domiciled at his office as specified above.