

## **PRIVACY POLICY**

Welcome to the [www.sirindustriale.com](http://www.sirindustriale.com) website of SIR Industriale S.p.A. a socio unico (hereinafter referred to as the “**Website**”).

With this Privacy Policy, SIR Industriale S.p.A. a socio unico provides the user with information regarding personal data processing that is collected automatically or that the user voluntarily provides, by accessing and navigating the Website and using the services provided therein.

Browsing is free and does not require any registration; if personal data is required, this is provided for in the “Work with Us” section, which includes a reference to the content of a specific information notice regarding personal data processing.

There may also be hyperlinks within the Website to third parties’ websites, pages or online services. By clicking these links, the user will be able to access multimedia content which, being exclusively pertaining to the persons, are beyond the control of SIR Industriale S.p.A. a socio unico and are in no way subject to the provisions of this Privacy Policy. SIR Industriale S.p.A. a socio unico therefore invites the user to be careful in joining services offered by third parties, to carefully read the information notices on data processing that are provided by the aforementioned persons, in relation to which SIR Industriale S.p.A. a socio unico cannot exercise control or bear any liability.

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### **1. Data Controller**

The data controller is SIR Industriale S.p.A. a socio unico (Tax Identification no. and VAT Registration no. 05379680969), with registered office in Macherio (MB), Via Bellini no. 35, telephone no.: 039.20721, e-mail address [sir@sirindustriale.com](mailto:sir@sirindustriale.com) and certified e-mail (PEC) [sirindustriale@pec.sirindustriale.com](mailto:sirindustriale@pec.sirindustriale.com) (hereinafter “**Company**”).

### **2. Types of personal data processed**

Personal data is defined as any information about the user and that refers to the user.

Specifically, the processing will relate to:

- **Personal data relating to browsing**

When accessing and browsing the Website, the Company generally collects browsing data using cookies or other tracking technologies. During their normal operation, the computer systems and software processes used to operate the Website automatically acquire certain data acquire some personal browsing data, the transmission of which is inherent in the use of Internet communication protocols.

This is data related to electronic traffic which, by nature, is not collected to be immediately associated with identified users, but which could, through processing or association with data held by third parties, allow the user to be identified. This category of data includes, for example, the “IP addresses” or domain names of the computers used to connect to the Website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the User's operating system and computer environment.

This data makes it possible to check that the Website is working properly, and the use of the services provided therein, to create profiles that allow the sending of advertising in line with the preferences expressed by the user, as well as to identify anomalies and/or abuses.

For more information on the technologies used to collect such data, please take note of the provisions in section 4) outlined below, on Cookies.

- **Data voluntarily provided by the user**

The Company also processes personal data voluntarily provided by the user during interaction with the services provided by the Website, when sending a CV for example. This data includes first name, last name, e-mail address,

telephone number, preferences about role and location, and additional information contained in the cover letter and CV (such as educational background, professional experience, personal interests, image, data revealing racial or ethnic origin, and those related to health) to send your application.

Hereinafter, collectively, “**Data**”.

The optional and voluntary sending of e-mail messages to the addresses indicated on this Website entails the acquisition of the sender’s e-mail address, as well as any additional personal data voluntarily indicated in the message. These data are used for the sole purpose of tracing the sender and are not disseminated in any way.

### **3. Purpose of processing, legal bases and nature of the provision of Data**

When consulting the Website and using the services provided therein, Data is processed for the following purposes:

- a. to enable Website browsing, monitor its proper functioning, and ascertain liability in the event of computer crimes (hereinafter “**Website browsing**”). The legal basis is the performance of the contract (Art. 6.1 b) of the Regulation), as well as legitimate interests of the Company (Art. 6.1 f) of the Regulation);
- b. to evaluate professional profiles and initiate the selection process aimed at establishing an employment or professional collaboration relationship (hereinafter referred to as “**Selection**”). The legal basis is the performance of pre-contractual steps (Art. 6.1(b) of the Regulation; Art. 111 *bis* of Italian Legislative Decree no. 196/2003) as to personal data and express consent (Art. 9.2 a) of the Regulation) as to any special data provided;
- c. to acknowledge and process requests received from the user (hereinafter “**Contacts**”). The legal basis is the performance of pre-contractual steps adopted upon the user’s request (Art. 6.1 b) Regulation);
- d. to exercise and defend the Company’s rights in any forum, including in judicial, administrative, arbitration and/or mediation and conciliation procedures (hereinafter “**Defence**”). The legal basis is the legitimate interests of the Company (Art. 6.1 (f) of the Regulation).

With the exception of browsing data (collected automatically), the provision of Data is necessary for pursuing the purposes set out in points b) and c) above. Therefore, failure by the user to provide the Data marked with (\*) will result in the Company’s inability to fulfil the request (specifically, assessing the professional profile and processing any requests), but without affecting Website browsing and Defence. Failure by the user to provide the Data marked with (\*), on the other hand, will not affect either the fulfilment of what is requested (specifically, assessing the professional profile and processing any requests), nor will it affect Website browsing and Defence.

### **4. Cookies**

The Website uses technical and profiling cookies, including third-party cookies, to enable normal browsing and enjoyment of the Website and to create profiles that enable the delivery of advertisements in line with user preferences. More information about the features of cookies on the Website can be found outlined in our [Cookie Policy](#).

### **5. How data is processed**

Within the scope of the purposes indicated in point 3) above, Data will be processed mainly by electronic means, as well as in paper form, in compliance with legal provisions applicable to the processing of personal data, taking appropriate security measures. Data processing is handled by the Company’s in-house staff (e.g., staff working in the administrative office and in the HR department) who are specially authorised, trained, and instructed to ensure adequate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorised parties.

### **6. Disclosure and sharing of Data**

The Data will not be shared. To the extent strictly relevant to the purposes outlined in 3) above, the Data may be disclosed to:

- parties entitled thereto by law or regulation, including but not limited to Public and Judicial Authorities;
- persons who, in their capacity as independent controllers or data processors pursuant to Art. 28 of

the regulation, are involved in the processing of Data (such as, but not limited to, the company in charge of managing and maintaining the computer systems and the Website).

The updated list of the data processors can be requested from the Company by sending a communication by e-mail to the address [privacy@sirindustriale.com](mailto:privacy@sirindustriale.com).

#### **7. Data storage period**

The Company will store the Data for the period of time strictly necessary to achieve the purposes for which this data was collected. Without prejudice to the express provisions of point 3) above, for the purposes of:

- **Selection**, the Data will be stored for the period of one year from the date on which they are collected;
- **Contacts**, the Data will be stored for the period of time strictly necessary to process the request and, in any event, no later than one year from the date on which they are collected;
- **Defence**, the Data will be stored for the duration of the dispute and until such time as the time limits for any appeal and/or the limitation period for the relevant action;

without prejudice, however, to the right to withdraw consent for those processing operations that are based on this legal basis, the exercise of the rights provided for in point 8) below including the right to object to the processing, as well as the fulfilment of specific storage obligations provided for by law.

#### **8. Rights of data subjects**

With reference to the Data, a request may be submitted to the Company, as specified in the Regulation and subject to the provisions and limitations set forth in Italian Legislative Decree no. 196/2003 (Part I – Title I – Chapter III):

- for access, in the cases provided for (Art. 15 of the Regulation);
- for rectification of inaccurate Data and completion of incomplete Data (Art. 16 of the Regulation);
- for erasure of the Data on the grounds provided for (Art. 17 of the Regulation), such as when they are no longer necessary for the purposes indicated above or are not processed in accordance with the Regulation;
- for the restriction of processing in the scenarios provided for (Art. 18 of the Regulation), such as in the event that the accuracy of the Data is contested and there is a need to verify their accuracy;
- for portability, i.e. the right to receive the Data, in the cases provided for (Art. 20 of the Regulation), in a structured, commonly used and machine-readable format, and to transmit such Data to another data controller;
- to object to processing, in the cases provided for (Art. 21 of the Regulation).

In the case of consent-based processing, such consent may be withdrawn at any time, without affecting the lawfulness of the processing carried out before the withdrawal.

All the rights listed above may be exercised by sending a communication to the Company by e-mail to [privacy@sirindustriale.com](mailto:privacy@sirindustriale.com) or by registered letter to the address of the Company's registered office, for the attention of the Privacy Contact Person.

#### **9. Complaints**

In the event that the user believes that the processing of Data violates the provisions contained in the Regulation, the user may lodge a complaint with the Italian Data Protection Authority, pursuant to Art. 77 of the Regulation.

#### **10. Transfer of Data abroad**

User Data are not transferred to third countries; they are stored at the Company's registered office and on servers located in the European Union.

Macherio, 2 January 2024