

## PRIVACY POLICY

### CLIENT PRIVACY INFORMATION DOCUMENT

Dear client, MAW Men At Work S.p.a. ("MAW"), pursuant to the relevant regulation for the protection of personal data in Legislative Decree 196/03, hereby informs you of information concerning the processing of personal information provided by yourself as an "interested party" and acquired by our company as the "owner of the processing", for purposes relative to the creation and execution of the contractual relationship and particular in reference to employment administration, search and selection of personnel, professional retraining and training courses, as well as for commercial, marketing and/or promotional purposes and for market research.

We remind you that "processing" means any operation or group of operations, executed with or without electronic or automated means, concerning the collection, registration, organisation, saving, consultation, analysis, modification, selection, extraction, comparison, use, interconnection, blocking, communication, distribution, cancellation and the destruction of data, even if not registered in a data bank.

All processing of personal data is carried out by MAW pursuant to principles of lawfulness, correctness, proportionality and non-excess, finality, quality, pertinence, transparency, with respect for the fundamental rights and freedom of the individual, in accordance with the law in force for

POLICY PRIVACY SL Rev.0 09.06.2017

personal data protection including general authorisations and prescriptions issued by the privacy protection authority. Personal data is processed by MAW for purposes connected with preliminary measures for the creation of commercial agreements, the satisfaction of contractual and legal obligations and the execution of the contract as well as consequential and instrumental compliance, including those involving public or private authorities. In addition, upon your consent, this data will be processed for the execution of economic activity particularly consisting of telephonic communication by our personnel and the dispatch via e-mail and telefax of information and promotional material concerning our services and initiatives as well as market research, direct sales of services and commercial communications.

The processing will be carried out manually or using electronic tools by especially commissioned and trained personnel to ensure that only indispensable data is used for the time strictly required for the achievement of the purposes for which it was collected and using suitable precautions to guarantee the security, privacy and any other right to which you are entitled. To this end MAW has adopted a suitable corporate policy for the protection of privacy, aimed at preventing loss and destruction of data, non-authorised access and processing that is illegal or not in conformity with the reasons for which it is collected.

MAW hereby informs you that the provision of the cited data is obligatory for contractual activities and optional for marketing activities. Refusal or incomplete or erroneous completion may make it impossible to enter into and manage contractual dealings with MAW and to execute marketing activities to inform you of our services.

If the processing should concern personal data considered to be "sensitive" in nature (that is data concerning race and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or religious, philosophical, political or trade union organisations as well as data concerning health or sexual practices), this processing will be executed only with your written consent, via the specific general authorisation of the privacy authority and in accordance with the requirements and the limits established by the Privacy Code, the law and regulations. Data concerning state of health cannot be distributed.

Details of legal rulings, concerning your person, can be processed only if authorised by an express legal disposition or by a disposition of the privacy authority that details the relative public interests for the processing, the type of processed data and the operations to be executed. Your personal data can be made known to external subjects who as Managers or Processing Authorities, work with the company and undertake data processing in formally assigned areas and in the conduct of our corporate activity. The complete list of these subjects can be consulted at the registered offices of the company, and depending on the objectives of the processing, mainly include the following: employment consultants, legal practices, credit recovery companies, banking and insurance institutes, taxation and accounting companies, IT companies and quality certification companies. In addition, for the purposes of the above-cited objectives, your data may become known to subjects/agencies/authorities that are appointed and/or competent with respect to verification and control of accounting, taxation and other legal obligations. Your personal data will not be distributed.

As the "interested" party you have the right to obtain:

1. confirmation of the existence or non-existence of personal data that concerns you, even if not registered and its communication in an understandable manner;
2. the indication:
  - a. of the origin of personal data;
  - b. of the aims and means of processing;

- c. of the logic applied if data is processed via electronic means;
  - d. of the names of the owner, managers and data processors as well as the subjects or categories of subjects to which personal data can be communicated or to whom it may become known;
3. the updating, the rectification or, where relevant, addition to the data;
  4. the cancellation, transformation in anonymous form or the blocking of data processed contrary to the law, including that for which archiving is not necessary pursuant to the objectives for which it was collected or successively processed;
  5. the attestation that the operations detailed at points 3 and 4 were made known, including that regarding their content, to those to whom data was communicated or distributed, except in the case that this is shown to be impossible or would involve the implementation of measures that are manifestly disproportionate compared to the right to be protected.

The interested party also has the right to completely or partially oppose:

- a. the processing of personal data for legitimate reasons, even if pertinent to the purpose for its collection;
- b. the processing of personal data for the purposes of distribution of advertising or direct sales material or for the execution of market research or commercial communication, via telephone with an operator (in this case the right to oppose can be exercised at any time, conveniently and without cost including via listing on the public Register of the opposition pursuant to the Presidential Decree no.178/2010) or via electronic communication such as telefax or electronic post (in this case it can be cancelled at any time, conveniently and without cost by clicking on the dedicated link at the bottom of the email message).

In order to exercise the rights cited above, pursuant to Art. 8 and Art. 9 of the Legislative Decree 196/03, the interested party can directly contact the Owner of the processed data, at the following address: MAW Men at Work Agenzia per il lavoro S.p.a., via Codignole n. 52 25124 Brescia, tel. 030.3556132, telefax 030.3540900, email: [privacy@maw.it](mailto:privacy@maw.it).

For matters not mentioned in this information document the interested party should refer to the dispositions of Legislative Decree no. 196/2003.

The legal representative of the OWNER OF THE PROCESSING FRANCESCO TURRINI

#### AGREEMENT OF THE INTERESTED PARTY

- I authorise MAW to process and communicate personal data for purposes connected with the services provided, declaring that I have been adequately informed of the purposes of this processing as well as rights under the Code for the protection of personal data (Legislative Decree no. 196 of 30th June 2003).
- I agree to the receipt of advertising or direct sales material and the use of this data in market research or commercial communications.

## SUPPLEMENTARY INFORMATION NOTE

The company MAW Men at Work S.p.a. also informs you that should delays in payment or nonpayment be noted that your personal information may be communicated to Experian Data Services s.r.l. with registered offices in via Carlo Pesenti no. 121/123, Rome, as manager, in the capacity of owner of the processing pursuant to ex Art. 28 of the Legislative Decree 169/2003 (Privacy Code) of a system on borrowing history (henceforth PPD) pursuant to Art. 119 of the Privacy Code. The processing exclusively concerns data related to the client ("Client") that is party to, or has asked to be party to, a commercial relationship with an employment agency.

PPD is a data bank, shared by member employment agencies that contains information on non-payment or late payment by Clients of employment agencies. The data contained in PPD can be used by the member employment agencies for the exclusive purpose of evaluating the reliability and/or solvency of its clients and their timeliness of payment.

The employment agencies that are members of the PPD system are private subjects, authorised by the Ministry for Labour, that as owners of the processing of personal data in question, use the data in the system and communicate to PPD on a systematic basis, data concerning payment arising from relationships with its Clients.

The categories of data processed by PPD, periodically updated during the course of the contractual relationship, are:

- a) Personal data, tax code or VAT registration number;
- b) Data relative to payments, in particular details of late payments;
- c) Data relative to legal proceedings for non-payment.

The categories of data processed as part of PPD and accessible by members of PPD are:

- a) Total of late payments grouped on the basis of the range of days of late payments beyond the agreed terms;
- b) Censured personal details of the Client limited to registry details, tax code, VAT registration number and address.

The data contained in PPD are processed via the use of automated techniques and systems to guarantee absolute privacy and so that they can also be used to create statistical evaluation models via summarised numerical indicators.

Provision of the data is optional, however, refusal to provide it may make it impossible to continue dealings or create the contractual relationship.

The data subject to processing in PPD may also become known to employers and collaborators of Experian Data Services s.r.l. who are specifically authorised for the processing as managers and/or processors, pursuant to the principles of necessity, pertinence and non-excess as per the Privacy Code.

Interested parties to the processing of the data in question can exercise rights pursuant to Art. 7 of the Privacy Code (right to obtain indications concerning the origin, objective, means and logic applied to the processing; right to obtain updating, rectification, amendment, cancellation, transformation in anonymous form, blocking of data processed contrary to the law; right to oppose processing for legitimate reasons, etc.) pursuant to the terms and according to the means

POLICY PRIVACY SL Rev.0 09.06.2017



established by the Privacy Code, also by applying to Experian Data Services s.r.l. at its operative headquarters in Via Salvo d'Acquisto 40/c -56025- Pontedera (PI).

POLICY PRIVACY SL Rev.0 09.06.2017

**MAW Men at Work S.p.A. Agenzia per il Lavoro S.p.A** - Tel +39 030 2428345/6 - Fax +39 030 2450532 - maw.it  
Aut.Min.Prot. 1131-SG of 29/11/04 - Registered Office Via Corfù, 50 - 25124 Brescia - Administrative Office Via Codignole, 52 - 25124 Brescia  
Registered Capital € 600,000.00 fully paid up, Listing in Business Register of Brescia, Tax Code and P.IVA 03472640170, REA 404649 – Subsidiary or controlled company  
of 520 SPA

## PRIVACY INFORMATION DOCUMENT FOR CANDIDATES

Dear Sir/Madam

**MAW Men At Work S.p.a. ("MAW")**, pursuant to the regulation for the protection of personal data, contained in Legislative Decree 196/03, hereby informs you of information concerning the processing of your personal data, acquired by our company, for the purpose of search and selection of personnel in the interest of its clients or for its organisational structure, including the fulfilment of consequential legal and contractual obligations. In addition, following your explicit consent, your data can be processed in order to inform you of employment opportunities or the possibility of taking part, free of charge, in public or private projects for future employment or professional retraining.

We remind you that "processing" means any operation or group of operations, executed with or without electronic or automated means, concerning the collection, registration, organisation, saving, consultation, analysis, modification, selection, extraction, comparison, use, interconnection, blocking, communication, distribution, cancellation and the destruction of data, even if not registered in a data bank.

All processing of personal data is carried out by MAW pursuant to principles of lawfulness, correctness, proportionality and non-excess, finality, quality, pertinence, transparency, with respect for the fundamental rights and freedom of the individual, in accordance with the law in force for personal data protection including general authorisations and prescriptions issued by the privacy protection authority.

The data is collected from the interested party by means of post, telefax, e-mail and by hand at our offices or via registration of your CV in our data bank or by answering specific postings, viewed on our site [www.maw.it](http://www.maw.it) and on dedicated public and private web sites (e.g.: [helplavoro](#), [infojobs](#), etc).

In addition, in exceptional circumstances, general personal data concerning your professional experience can be collected based on your consent from previous employers, as indicated by yourself during the job interview.

The processing will be carried out manually or using electronic tools by especially commissioned and trained personnel to ensure that only indispensable data is used for the time strictly required for the achievement of the purposes for which it was collected and using suitable precautions to guarantee the security, privacy and any other right to which you are entitled.

To this end MAW has adopted a suitable corporate policy for the protection of privacy, aimed at preventing the loss and destruction of data, non-authorised access and processing that is illegal or not in conformity with the reasons for which it is collected.

To facilitate the evaluation of your CV we suggest that you include in the same only general personal data; if sensitive data such as inclusion in "protected categories" should be listed in the CV, this data will be processed only with your written agreement. Additional sensitive data ("sensitive" includes

POLICY PRIVACY SL Rev.0 09.06.2017

data related to racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, religious, philosophical, political or trade union organisations as well as personal data related to health and sexual activity) will be immediately cancelled.

In the case of response to a specific posting or the unsolicited dispatch of your CV, your data will be processed by MAW, based on your explicit consent, including for future similar selections.

In addition, based on your consent, your data will be processed to inform you, via telephonic communications by our personnel or through e-mail or text, of offers of employment or free initiatives to favour future employment or professional retraining.

Your data will be stored for a maximum of 12 months starting from the date of response to the announcement or the dispatch of your CV or latest update. After this time your data will be cancelled from the data bank and paper copies will be made illegible through destruction.

MAW informs you that the provision of your data for the purposes of job candidature is optional. Refusal or the incomplete or erroneous provision of necessary information will, however, make it impossible to carry out research and selection activities.

Your personal data may come to be known by external subjects who are Managers or Data Processors, work with our company and carry out processing in formally designated areas or whilst executing our business activity. The complete and updated list of these subjects is available at the registered office of the company and, depending on the objectives of the processing, mainly includes the following categories of subjects: legal professionals, employment consultants, accountants, career guides, teachers and IT consultants.

In addition, for the purposes of the above-cited objectives, your data may become known to public and private subjects that are commissioned to undertake, in their interests, search and selection of personnel or to public or private authorities concerned with the promotion of initiatives for future recruitment and/or professional retraining and may also become known to subjects/agencies/authorities appointed and/or specialised in verification and checks concerning the fulfilment of accounting, taxation and other legal obligations.

Your personal data will not be distributed in any case.

As the “interested” party you have the right to obtain:

1. confirmation of the existence or non-existence of personal data that concerns you, even if not registered and its communication in an understandable manner;
2. the indication:
  - a) of the origin of personal data;

POLICY PRIVACY SL Rev.0 09.06.2017

- b) of the aims and means of processing;
  - c) of the logic applied if data is processed via electronic means;
  - d) of the names of the owner, managers and data processors as well as the subjects or categories of subjects to which personal data can be communicated or to whom it may become known;
3. the updating, the rectification or, where relevant, or addition to the data;
4. the cancellation, transformation in anonymous form or the blocking of data processed contrary to the law, including that for which archiving is not necessary pursuant to the objectives for which it was collected or successively processed;
5. the attestation that the operations detailed at points 3 and 4 were made known, including that regarding their content, to those to whom data was communicated or distributed, except in the case that this is shown to be impossible or would involve the implementation of measures that are manifestly disproportionate compared to the right to be protected.

The interested party also has the right to completely or partially oppose:

- a) the processing of personal data for legitimate reasons, even if pertinent to the purpose for its collection;
- b) to the processing of personal data for the purposes of the dispatch of advertising or direct sales material or for market research or commercial communication, via telephone with an operator (in this case the right to oppose can be exercised at any time, conveniently and without cost including via listing on the public Register of the opposition pursuant to the Presidential Decree no.178/2010) or via electronic communication such as telefax or electronic post (in this case it can be cancelled at any time, conveniently and without cost by clicking on the dedicated link at the bottom of the email message) and text.

In order to exercise the rights cited above, pursuant to Art. 8 and Art. 9 of the Legislative Decree 196/03, the interested party can directly contact the Owner of the processed data, at the following address: MAW Men at Work S.p.a, Agenzia per il Lavoro via Codignole n. 52 25124 Brescia, tel. 030.3556132, telefax 030.3540900, email: [privacy@maw.it](mailto:privacy@maw.it)

For matters not mentioned in this information document the interested party should refer to the dispositions of Legislative Decree no. 196/2003.

The legal representative of the OWNER OF THE PROCESSING

**FRANCESCO TURRINI**

## **AGREEMENT OF THE INTERESTED PARTY**

- I authorise MAW to process and communicate personal data for purposes connected with the provided services, declaring that I have been adequately informed concerned the objectives



of this processed data as well as my rights to the protection of personal data under the Code (Legislative Decree of 30 June 2003).

- I authorise MAW to use my candidature also for similar future selections.
- I agree to receive information regarding training and work placement initiatives.

PLACE AND DATE

SIGNATURE

## CONSENT TO THE PROCESSING OF SENSITIVE DATA

For the processing of sensitive data (e.g. inclusion in protected categories), the candidate must print, sign and dispatch the following consent form to MAW Men At Work S.p.a. Agenziale per il Lavoro, via Corfù 50, Brescia, or send a PDF file to the e-mail address [privacy@maw.it](mailto:privacy@maw.it) :

The undersigned, in his/her capacity as candidate, declares that he/she has read the information document on privacy and, pursuant and to the effects of Art. 26 of the Privacy Code, agrees to the processing of this sensitive data by MAW Men At Work S.p.a. Agenziale per il Lavoro ("MAW")

- a) This processing is for purposes strictly connected with the research and selection of personnel and for information on the possibility of taking part, free of charge, in public and private projects for recruitment or professional retraining.

- Agree    Do not agree

PLACE AND DATE

SIGNATURE