Privacy Notice for the Processing of Applicants' Personal Data

Pursuant to and for the purposes of Articles 13 of Legislative Decree No. 196 of 30 June 2003 (Italian Personal Data Protection Code) and 13 of Regulation (EU) 2016/679 (General Data Protection Regulation), this notice is addressed to individuals who submit their curriculum vitae (CV), either in response to a job advertisement or through an unsolicited application, to **ILPRA S.p.A.**

1. Data Controller

The Data Controller is **ILPRA S.p.A.**, with its registered office at Galleria Buenos Aires 13, 20124 Milan (MI), Italy, and operational headquarters at Via Mattei 21, 27036 Mortara (PV), Italy, represented by its pro tempore legal representative.

The Data Controller may be contacted at **info@ilpra.com** or via certified email (PEC) at **ilpra@registerpec.it**.

2. Categories of Data Processed

The processing may concern identification and contact data, information relating to education, skills, professional experience, qualifications, availability for employment, and any other information contained in the CV or provided during the recruitment process, including interviews, assessments, and correspondence with the candidate.

Candidates are requested not to submit data that is irrelevant or excessive in relation to the selection process.

3. Purposes of the Processing

Personal data are processed for the following purposes:

- Receiving and managing applications;
- Verifying the suitability of a candidate's profile for available positions;
- Conducting recruitment and selection activities;
- Organizing interviews and assessments;
- Communicating with candidates;
- Evaluating the potential establishment of an employment or collaboration relationship with **ILPRA S.p.A.** or other companies within the Group.

Where an application may be relevant to opportunities within other Group companies, personal data may be shared with such companies exclusively for recruitment, analysis, and candidate selection purposes, in compliance with the principles of necessity, relevance, and data minimization.

4. Legal Basis for Processing

For recruitment activities relating to a specific position, or otherwise requested by the candidate, processing is carried out pursuant to Article 6(1)(b) GDPR, as it is necessary for the implementation of pre-contractual measures taken at the request of the data subject.

Where relevant for organizational management and the protection of the Controller's rights, processing may also be based on the Controller's legitimate interest pursuant to Article 6(1)(f) GDPR, following an assessment that balances such interest against the rights and freedoms of the candidate.

As part of recruitment and selection activities, where a candidate's professional profile is consistent with the skills, experience, and expectations expressed by the candidate, the personal data contained in the application may also be shared with other companies within the Group to assess potential interest in employment opportunities available with those companies. Such processing is carried out as it is necessary for the implementation of pre-contractual measures requested by the data subject.

Data sharing will take place in accordance with the principles of necessity, relevance, minimization, and proportionality in relation to the purposes pursued.

5. Processing of Special Categories of Data

If a candidate requests the application of legislation concerning targeted employment under **Law No. 68 of 12 March 1999**, it is sufficient to indicate possession of the relevant requirements without describing medical conditions or providing unnecessary health-related information.

Any special categories of personal data pursuant to Article 9 GDPR will be processed only when necessary and permitted under applicable law, based on one of the conditions set out in Article 9 GDPR and, where required, following the candidate's explicit consent.

Candidates are invited not to include special category data in their CV unless strictly necessary for the selection process.

6. Processing Methods and Use of Artificial Intelligence Tools

Personal data are processed using both paper-based and electronic means, in compliance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality.

To support recruitment activities, **ILPRA S.p.A.** may use systems and functionalities based on artificial intelligence (AI). Such tools may be used, by way of example, to:

- Extract and organize information contained in CVs;
- Identify skills and professional experience;
- Match candidate profiles against job requirements;
- Generate summaries, classifications, or compatibility indicators;
- Facilitate candidate searches.

These tools are used solely for organizational support and application analysis purposes and do not autonomously determine the outcome of the selection process, which remains subject to evaluations carried out by authorized personnel.

ILPRA S.p.A. adopts appropriate organizational and technical measures aimed at reducing the risk of inaccurate, irrelevant, or discriminatory outcomes and ensuring that only data necessary for recruitment purposes are used.

7. Recipients and Sharing with Group Companies

Personal data may be processed by employees and collaborators of **ILPRA S.p.A.** who are duly authorized and instructed, as well as by service providers acting, where applicable, as data processors pursuant to Article 28 GDPR.

Such providers may include entities supplying:

- IT services;
- Hosting services;
- Applicant management platforms;
- Consultancy services;
- Recruitment and selection services;
- Artificial intelligence systems or services.

Personal data may also be communicated to other companies within the Group to evaluate candidates for employment opportunities available within those companies.

Where a Group company independently determines the purposes and means of processing, it will act as an independent data controller and provide its own privacy notice where required. Where two or more companies jointly determine the purposes and means of processing, their respective roles will be governed in accordance with Article 26 GDPR.

An updated list of data processors and recipient Group companies may be requested from the Data Controller using the contact details provided in this notice.

8. Transfer of Data Outside the European Union

The use of service providers, IT infrastructures, or artificial intelligence services may involve the transfer, access, or processing of personal data in countries located outside the European Union, including by sub-processors.

In such cases, transfers will take place in accordance with Articles 44 et seq. GDPR, based on an adequacy decision of the European Commission or, where no such decision exists, through appropriate safeguards such as the Standard Contractual Clauses adopted by the European Commission, supplemented where necessary by additional protective measures.

The derogations provided by Article 49 GDPR will be used only in the circumstances and under the conditions established by applicable legislation.

Candidates may request information regarding the countries involved, the legal basis relied upon for the transfer, and the safeguards adopted, as well as obtain a copy of such safeguards or information on where they are available, by contacting the Data Controller.

9. Data Retention

Personal data will be retained for the period necessary to manage the recruitment process.

For unsolicited applications and for consideration of a profile in relation to future opportunities, personal data will be retained for a maximum period of **18 months** from receipt of the CV, unless:

- The application is updated;
- The candidate requests otherwise;
- Retention is required to comply with legal obligations or to protect rights in judicial proceedings.

At the end of the applicable retention period, personal data will be permanently deleted or irreversibly anonymized.

Service providers and recipient Group companies will be required to apply retention periods consistent with the purposes pursued and their respective privacy roles.

10. Rights of the Data Subject

In the cases provided for by applicable law, candidates may exercise the rights of:

- Access;
- Rectification;
- Erasure;
- Restriction of processing;

- Data portability;
- Objection to processing.

Candidates may also withdraw any consent previously given, without affecting the lawfulness of processing carried out prior to such withdrawal.

Candidates additionally have the right to lodge a complaint with the competent Data Protection Authority.

Requests to exercise these rights may be submitted by registered mail to the registered office of the Data Controller or by certified email (PEC) to **ilpra@registerpec.it**.

11. Provision of Data

Providing personal data is voluntary.

However, failure to provide the information necessary for the recruitment process will prevent **ILPRA S.p.A.** from examining and managing the application.

Candidates are responsible for ensuring the accuracy and updating of the information provided.

12. Updates to this Notice

This Privacy Notice may be updated to reflect regulatory, organizational, or technological changes.

The updated version will be made available through the channels used for collecting applications.