

PRIVACY POLICY - APPLICANTS

Boies Schiller Flexner Studio Legale, with registered office in Milan, via Orefici no. 2, 20123 Milan, Italy, VAT no. 14447100968, in its capacity as data controller (hereinafter, the "**Data Controller**"), informs you pursuant to EU Regulation 2016/679 ("**GDPR**") and the current national legislation on the protection of personal data that your data will be processed in the following ways and for the following purposes:

1. OBJECT OF THE PROCESSING

The categories of "personal data" (pursuant to Article 4, paragraph 1 of the GDPR) processed by the Data Controller may be, by way of example but not limited to:

- Personal and identification data (such as, for example, name, date of birth, place of birth, nationality, tax code, occupation/trade, etc.);
- Contact data (such as, for example, address, e-mail address, telephone number, etc.);
- Special data (such as, for example, relating to health status such as, for example, data for the verification of suitability for certain jobs, data relating to belonging to protected categories, where necessary for the activity to which you have applied).

2. PURPOSES AND LEGAL BASES OF THE PROCESSING

Your Personal Data is processed for the following purposes and legal bases:

- the fulfilment of contractual and pre-contractual obligations pursuant to art. 6(1)(b) GDPR and, in particular, for:
 - the correct conduct of the personnel selection process (e.g. management of applications);
 - the possible fulfilment of pre-contractual and contractual obligations necessary for the establishment of the employment relationship;
- the pursuit of a legitimate interest of the Data Controller pursuant to art. 6(1)(f) and, in particular, for:
 - the prevention and repression of illegal acts;
 - the exercise of the Data Controller's rights in court and the management of litigation;
 - process public information relating to your profile on social networks of a professional nature to verify that the data you provide correspond to what you have declared, limited to professional information only;
- the fulfilment of legal obligations and the exercise of the specific rights of the data controller or the data subject in the field of labour law, social security and social protection pursuant to art. 6 (1)(c) GDPR and 9(2)(b) GDPR.

3. METHODS OF PROCESSING

The processing of your data is carried out, both in paper and electronic mode in order to minimize the risk of destruction, loss (including accidental loss), unauthorized access/use or use incompatible with the initial purpose of the collection. This is achieved with the technical and organisational security measures implemented by the Data Controller.

4. DATA RETENTION

The Data Controller processes Personal Data for the time necessary to fulfil the above purposes and in any case no later than 12 months from collection or, in the case of the establishment of an employment relationship, for 10 years from its termination.

5. PROVISION OF DATA

The provision of data for the purposes described above is necessary and compulsory and any refusal to

provide such data will make it impossible to continue with the selection phase and, possibly, to establish or continue the employment relationship.

6. DATA TRANSFER

Within the scope of the aforementioned purposes, the Data Controller may communicate your data to:

- employees and/or collaborators, duly instructed and authorized to process pursuant to art. 29 GDPR and 2-quaterdecies of Legislative Decree 196/2003;
- third parties (e.g., accountants, payroll and labor consultants, health bodies, social security and supplementary health care funds and funds, including corporate ones, banking institutions, brokerage agencies and administrative practices, employers' associations, freelancers, etc.) who carry out outsourced activities on behalf of the Data Controller and who will process the data in their capacity as independent data processors or data controllers.

You may request the Data Controller, at any time, from the updated list of data processors.

7. DATA TRANSFER

The Data Controller may make transfers outside the European Economic Area for the purposes indicated above. This will be done exclusively on the basis of an adequacy decision pursuant to art. 45 GDPR or, in any case, in compliance with the guarantees set out in Chapter V of the GDPR.

8. RIGHTS OF THE DATA SUBJECT

The Data Controller informs you that, as a data subject, if the limitations provided for by law are not met, you have the right to:

- obtain confirmation of the existence or otherwise of your personal data, even if not yet recorded, and that such data be made available to you in an intelligible form;
- obtain information and, where appropriate, a copy of: a) the origin and category of the personal data; b) the logic applied in the case of processing carried out with the aid of electronic tools; c) the purposes and methods of processing; d) the identification details of the Data Controller and the data processors; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them, in particular if recipients of third countries or international organisations; (f) where possible, the period for which the data is retained or the criteria used to determine that period; g) the existence of an automated decision-making process, and, if so, the logic used, the importance and the expected consequences for the data subject; h) the existence of adequate safeguards in the event of data transfer to a non-EU country or an international organisation;
- obtain, without undue delay, the updating and correction of inaccurate data or, where interested, the integration of incomplete data;
- revoke at any time, easily, without hindrance, the consents given, using, if possible, the same channels used to provide them;
- obtain the cancellation, transformation into anonymous form or blocking of data: a) unlawfully processed; b) no longer necessary in relation to the purposes for which they were collected or subsequently processed; c) in the event of withdrawal of the consent on which the processing is based and in case there is no other legal basis, d) if you have objected to the processing and there is no overriding legitimate reason to continue the processing; e) in the event of compliance with a legal obligation; f) in the case of data relating to minors. The Data Controller may refuse

erasure only in the case of: a) exercising the right to freedom of expression and information; b) compliance with a legal obligation, performance of a task carried out in the public interest or exercise of official authority; c) reasons of public health interest; d) archiving in the public interest, scientific or historical research or for statistical purposes; e) exercise of a right in court;

- obtain the limitation of processing in the event of: a) contesting the accuracy of the personal data; b) unlawful processing by the Data Controller to prevent its cancellation; c) exercise of your right in court; d) verification of the possible prevalence of the legitimate reasons of the Data Controller over those of the data subject;
- receive, if the processing is carried out by automatic means, without hindrance and in a structured, commonly used and readable format, the personal data concerning you in order to transmit them to another controller or – if technically feasible – to obtain direct transmission by the Controller to another controller;
- object, in whole or in part, for legitimate reasons, related to your particular situation, to the processing of personal data concerning you;

In the above cases, where necessary, the Data Controller will inform the third parties to whom your personal data are communicated of any exercise of the rights by you, except in specific cases (e.g. when this fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right).

If the data subject believes that his or her rights have been compromised, he or she has the right to lodge a complaint with the Data Protection Authority. For any further information, we invite you to consult the website of the Italian Data Protection Authority – www.garanteprivacy.it – where you will find a section dedicated to these rights.

9. HOW TO EXERCISE RIGHTS

You may, at any time, exercise your rights:

- by sending a registered letter with return receipt to the address of the Data Controller;
- by sending an email to privacy@bsfillp.com.