

Policy for workers

NILVIA S.R.L., VIA TRIESTE N. 26/A/1 - 36065, MUSSOLENTE - VI, VAT number: 01468030240, as data controller of the personal data pursuant to Article 4 of EU Regulation 2016/679 (RGDPR), makes this information available both in electronic and paper format, in accordance with Article 13 of the Regulation, for the processing of your personal data and those of your family members.

Category of data processed

We use personal, identifying and non-sensitive data (such as: name, surname, address, telephone number, fiscal code, age, gender, place and date of birth, bank details, contact details), data relating to the family (in particular civil status, minors, dependent family members), personal data relating to education and work (CV, qualifications, internships or professional training, professional skills, remuneration, checks, wage and deduction additions, any company-owned assets assigned to the employee by way of benefit or other, data concerning shifts and working hours). The company may also process certain data that can reveal:

- health conditions: certificates relating to absences due to illness, maternity or accidents, data relating to occupational diseases, disability, pregnancy, maternity leave or breastfeeding, the accident register, exposure to risk factors, psycho-physical fitness to perform specific duties, minority group membership;
- religious, philosophical or other convictions: permission granted for religious holidays, special canteen services, expression of conscientious objection;
- political opinions, membership of trade unions, political associations or trade union parties: data relating to the exercise of public functions or political offices, data relating to union activities and assignments or deductions for the payment of union service fees.

Purposes of the treatment

The collection and processing of personal data is carried out:

- for the possible conclusion of the individual employment contract that can also be non-standard, partial or temporary, or related to another type of contract that has not yet been stipulated;
- for any hiring, if this has not already occurred, and related mandatory disclosures;
- for the processing and payment of remuneration;
- for the fulfilment of all the practices required by the regulations in force concerning work;
- for the fulfilment of legal and contractual obligations, including collective, connected to the employment relationship;
- for the termination of the employment relationship and related disclosures;
- for professional training or participation in compulsory training courses or ones organised by the company for professional qualification requirements of an optional nature;
- for the protection of individual workers within the organisation;
- for the fulfilment of obligations relating to the health and safety of workers (Legislative Decree 81/2008);
- for the exercise of trade union activity in workplaces;

- for the execution of obligations assumed by the Data Controller in relation to purchase and service agreements and contracts stipulated with another company, entity or subject for which the activity of the interested party is necessary;
- for the fulfilment of obligations deriving from insurance policies taken out by the Data Controller to cover the risks connected with matters of hygiene and safety at work, occupational diseases, damage caused to third parties in the performance of its business or professional activities;
- for the fulfilment of obligations and duties envisaged by national and EU legislation on accounting, pensions and health care, including supplementary forms;
- for ascertaining, exercising and/or defending rights in court, as well as in administrative and arbitration and conciliation procedures in the cases provided for by community and national legislation, regulations or collective agreements;
- for storage under a requirement of law;
- for disclosure to third parties in compliance with legal obligations/Authority orders;
- for maintenance of computer systems and devices.

Legal basis for data processing

Your personal and family data are lawfully processed for the purposes listed above, in relation to the following legal bases:

- contract or pre-contractual measures (Article 6, letter b, GDPR);
- fulfilment of a legal obligation (Article 6, letter c, GDPR);
- legitimate interest of the data controller, consisting in the conduct of business activities (Article 41, Cost) for ascertaining, exercising and/or defending rights in court, as well as in administrative and arbitration and conciliation procedures in the cases provided for by community and national legislation, regulations or collective agreements (Article 6.1, letter f, GDPR).

For the purpose of execution and management of the employment relationship, the Data Controller will need to process particular categories of data pursuant to Article 9 of GDPR 679/16 (so-called sensitive data), better specified in the section on the types of processed data.

The data concerning health conditions processed by the competent doctor in performing the tasks required for Legislative Decree 81/08 and other provisions concerning workplace hygiene and safety, for carrying out preventive and periodic medical checks, will be processed exclusively by the doctor as an independent data controller. The doctor will provide the employer only with opinions on fitness.

The processing of such data is not subject to consent as it is necessary to fulfil obligations and exercise the rights of the data controllers and data subjects in matters of labour law, social security and social protection, and for assessment of the employee's suitability for work (Article 9, paragraph 2, letters b) and h) of the GDPR).

None of our processing is based on consent. The legal bases on which we operate are: contract, legal obligation and legitimate interest.

We do not carry out processing with automated decision-making processes or profiling.

Mandatory or voluntary nature of the supply of data and consequences of refusal

The provision of data is mandatory for everything that is required by legal and contractual obligations and therefore any refusal to provide them in whole or in part may make it impossible to execute the contract or to properly perform all those obligations concerning remuneration, contributions, tax and insurance connected to the employment relationship.

Communication of data to third parties

Notwithstanding communications made to fulfil legal and contractual obligations, all the information collected and processed may be communicated only for the purposes indicated above, to:

- Public bodies and organisations (e.g. INPS, INAIL, National Labour Institute, Tax Offices, ASL, Spisal);
- Pension and welfare funds or plans, including private ones;
- Medical practices fulfilling the legal requirements in the field of hygiene and occupational safety;
- Insurance companies and credit institutions;
- Trade unions specifically mandated by you;
- Associations, organisations, federations or confederations representing categories of employers;
- Joint employment bodies or bodies that run labour observatories;
- Supplementary funds;
- Judicial authorities, public authorities and law enforcement authorities;
- state and regional administrations;
- police station and prefecture;
- entities, professionals, companies or other establishments entrusted by us with the processing related to the fulfilment of administrative, accounting, insurance and management obligations (auditing companies, financial administration, tax assistance centres);
- payroll processing companies (e.g. payroll processing services, including all remuneration, contribution and tax claims);
- to the customers of the undersigned and in general to companies or bodies with whom the company has undertaken contractual commitments the execution of which requires the employee to do his work;
- travel agency for missions on behalf of the company;
- Universities, schools of all types and levels or training centres;
- Shipping companies;
- graphic industry companies;
- persons authorised by us to process data, who are committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators);
- providers of installation, assistance and maintenance services for IT and telematic facilities and systems, as well as all the services functionally connected to and necessary for fulfilment of the contract.

Transfer of data abroad

The Data Controller shall not transfer personal data outside the European Economic Area. The Controller, however, reserves the right to use services in the *cloud*, in which case the service providers will be selected from those who provide adequate guarantees in accordance with applicable law.

Data retention times

Your personal data will be processed for the entire duration of the employment relationship for the above purposes. They will then be kept for fulfilment of all legal obligations regarding employment relationships, and more generally, up to the time allowed by the national legislation for the protection of personal interests (10 years or 5 years depending on the case) unless the data has to be stored for longer due to interruption of the limitation. The curriculum vitae will be cancelled at the time of recruitment or non-recruitment.

Rights of the data subject and complaints to the Supervisory Authority

We inform you that you can exercise the following rights with regard to the processing of your personal data:

- a) **Right to obtain access to your personal data** (Art. 15, GDPR): you can contact us to find out if your personal data is being processed and the information required by law on processing;
- b) **Right of rectification** (Art. 16, GDPR): to obtain the correction of your inaccurate personal data or the integration of incomplete data;
- c) **Right to cancellation/oblivion** (Art. 17, GDPR): obtain the cancellation of your personal data, in the cases provided for by law;
- d) **Right to the limitation of processing** (Art. 18, GDPR): to obtain the submission of your personal data to the storage only, with the exclusion of other activities, in the hypotheses provided for by the law;
- e) **Right to portability** (Art. 20, GDPR): to obtain your personal data in a structured format, of common use and readable by automatic devices and also to obtain the direct transfer to another data controller for the processing, in the hypotheses provided for by the law;
- f) **Right to oppose** (Art. 21, GDPR): right to stop further processing of personal data for reasons related to your particular situation, unless our legitimate reasons prevail, in the cases provided for by law;
- g) **Right to withdraw consent** (Art. 7.3, GDPR): right to withdraw consent at any time in cases where processing is based on consent.

To exercise the above rights, you can use the Controller's contact details provided in this Policy. The exercise of the rights is not subject to any formal constraint and is free of charge.

We also inform you of your right to make a **complaint before the competent authority** for personal data protection. We remind you that complaints, according to Art. 77.1 of the GDPR, can be filed by data subjects with the Authority of the place where the data subjects habitually reside, where they work or where the alleged violation occurred.

Owner of the Treatment

The Owner of the Treatment is the company
NILVIA S.R.L. Contact data of the Owner of
the Treatment:

- e-mail: amministrazione@nilvia.it
- telephone: +39 0424 36591
- VIA TRIESTE N. 26/A/1 - 36065, MUSSOLENTE - VI - ITALY

Amendments

This Policy has been in force since 25 May 2018. We reserve the right to modify or simply update the content, in part or in full, also due to changes in the applicable legislation. We will inform you of these changes as soon as they are introduced.