

## Privacy Policy

### Work with us - applications

*This privacy policy provides all the information on the processing of personal data carried out by **Htech S.r.l.** when the data subject submits a job application (as detailed below).*

#### 1. INTRODUCTION – WHO WE ARE?

**Htech S.r.l.**, with registered office in **Milan - Corso Di Porta Nuova 34 - 20121, Italy**, VAT No. and Fiscal Code No. **11713660964** and registration number in the Italian trade Register of Milan under number **11713660964** (hereinafter, “**Data Controller**”), as the Data Controller of the personal data of data subjects submitting job applications (hereinafter, “**Data Subjects**”) hereby provides the privacy policy pursuant to Regulation EU 2016/679 (hereinafter, “**Regulation**” or “**Applicable Law**”).

#### 2. HOW TO CONTACT US?

The Data Controller takes the utmost account of its Data Subjects’ right to privacy and protection of personal data. For any information related to this privacy policy, Data Subjects may **contact the Data Controller** at any time, using the following methods:

- By sending a registered letter with acknowledgment of receipt to the registered office of the Company (Milan - Corso Di Porta Nuova 34 - 20121, Italy);
- By sending an e-mail to [privacy@heritageholdings.co](mailto:privacy@heritageholdings.co)

Data Subjects may also **contact the Data Protection Officer (RPD or DPO)** of the Data Controller for any information or request to the following contact details: [privacy@heritageholdings.co](mailto:privacy@heritageholdings.co)

#### WHAT DO WE DO? - PROCESSING PURPOSES

Data Subjects may send job applications to the Data Controller, also by completing request forms (where required), with the purpose of establishing a work relationship or collaboration with the Data Controller, which collects personal data relating to Data Subjects.

Particularly, the personal data of the Data Subjects will be lawfully processed for the following purposes:

- a) **processing the Data Subject’s application**: the personal data of the Data Subjects are collected and processed by the Data Controller for the sole purpose of processing their application. The Data Subject’s data collected by the Data Controller for this purpose might include name and surname, date of birth, e-mail address, mobile phone number, qualifications degree, Final Grade and any previous work experience and any further personal data communicated by the Data Subject to the Data Controller during the interview, via email and/or via private messages (such as on LinkedIn). Without prejudice to what is provided elsewhere in this privacy policy, in no case will the Data Controller make the personal data of the Data Subject accessible to other Data Subject and/or third parties.
- b) **administrative and accounting purposes**, i.e., to carry out activities of an organizational, administrative, financial and accounting nature, such as internal organizational activities and activities functional to the fulfilment of contractual and pre-contractual obligations;
- c) **legal obligations**, namely, to comply with obligations imposed by law, an authority, a regulation or European legislation.

The provision of personal data for the above processing purposes is optional but necessary, as failure to provide such data will make it impossible to apply to be part of the Data Controller’s team.

It is possible that some personal data necessary for the pursuit of the processing purposes described in this paragraph 3 are indicated with an asterisk in the request form (where required).

#### 3. LEGAL BASIS FOR PROCESSING

**Processing the Data Subject’s application** (as described in the previous paragraph 3, letter a)): the legal basis consists of art. 6, paragraph 1, lett. b) of the Regulation, or the processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.

**Administrative and accounting purposes** (as described in the previous paragraph 3, letter b)): the legal basis consists of art. 6, paragraph 1, lett. b) of the Regulation, as the processing is necessary for performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract.

**Legal obligations** (as described in the previous paragraph 3, letter c)): the legal basis consists of art. 6, paragraph 1, lett. c) of the Regulation, as the processing is necessary for compliance with a legal obligation to which the Data Controller is subject.

#### 4. PROCESSING METHODS AND DATA RETENTION PERIOD

The Data Controller will process the personal data of Data Subjects using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the personal data.

The personal data of Data Subjects will be retained for the time strictly necessary to carry out the main purposes explained in paragraph 3 above that is 365 days from the time of the collection and, in any case, as necessary for the protection in civil law of the interests of both the Data Subjects and the Data Controller.

#### 5. TRANSMISSION AND DISSEMINATION OF DATA

The Data Subject's personal data may be transferred outside the European Union, and, in this case, the Data Controller will ensure that the transfer takes place in accordance with the Applicable Law and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate guarantees) of the Regulation.

In particular, the Data Subject's personal data may be transferred to the United Kingdom (UK) – and, in this case, the transfer is based on a decision of the European Commission on the adequacy of data protection in the UK.

The personal data of the Data Subjects may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing Data Subjects' requests. These subjects, who have been instructed to do so by the Data Controller pursuant to Article 29 of the Regulation, will process the Data Subject's data exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Law.

The personal data of the Data Subjects may also be disclosed to third parties who may process personal data on behalf of the Data Controller as "**Data Processors**" pursuant to Article 28 of the Regulation, such as, for example, IT and logistic service providers, suppliers of outsourcing or cloud computing services, professionals and consultants.

Data Subjects have the right to obtain a list of any data processors appointed by the Data Controller, making a request to the Data Controller in the manner indicated in paragraph 7 below.

#### 6. RIGHTS OF THE DATA SUBJECTS

Data Subjects may exercise their rights granted by the Applicable Law by contacting the Data Controller as follows:

- By sending a registered letter with acknowledgment of receipt to the registered office of the Company (Milan - Corso Di Porta Nuova 34 - 20121, Italy);
- By sending an e-mail to [privacy@heritageholdings.co](mailto:privacy@heritageholdings.co)

Pursuant to the Applicable Law, Data Subjects have:

- a. the **right to withdraw consent** at any time, if the processing is based on their consent;
- b. the **right of access** to personal data;
- c. (where applicable) the **right to data portability** (the right to receive all personal data concerning them in a structured, commonly used and machine-readable format), the **right to restriction of processing** of personal data, the **right to rectification** and the **right to erasure** ("right to be forgotten");
- d. the **right to object**:
  - i. in whole or in part, for legitimate reasons to the processing of personal data concerning them, even if relevant to the purpose of collection;
  - ii. in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- e. if they consider that the processing of their personal data is in breach of the Regulation, the **right to lodge a complaint with a supervisory authority** (in the Member State in which they have their habitual residence, in the Member State in which they work or in the Member State in which the alleged breach has occurred). The Italian Supervisory Authority is the Garante per la protezione dei dati personali, located in Piazza Venezia n. 11, 00187 - Rome (<http://www.garanteprivacy.it/>).

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The Data Controller is not responsible for updating all links that can be viewed in this cookie policy, therefore whenever a link is not functional and/or updated, Data Subjects acknowledge and accept that they must always refer to the document and/or section of the websites referred to such link.