

TSTAT S.r.l.'s EU Candidate Privacy Notice

We know that you care how we use information about you, and we appreciate your trust in us to do that carefully and sensibly. This Notice outlines how we collect and use the personal data of our candidates.

Who does this Notice apply to?

This Notice applies to all employment candidates of TStat S.r.l. and its affiliated companies in the European Economic Area (the "EEA"), Switzerland, and the United Kingdom.

What personal data does TStat collect about you, and how do we use it?

TStat controls which personal data is collected and how it is used. In Italy, as in other EU countries, TStat S.r.l. is therefore referred to as the "Data Controller".

Generally, the personal data we collect from you helps us manage your recruiting and hiring process, conduct TStat's businesses, and comply with our legal obligations.

We collect and use the following categories of personal data from and about our candidates (some or all may apply to you):

- Identification data
- Contact information
- Demographic data
- Data regarding responses to screening questions
- Background check information
- Previous employment information
- Data pertaining to work preferences and abilities
- Data contained in your curriculum vitae
- Information on certain health conditions (only when requested by law)
- Job interview notes
- Assessment results
- Travel-related records
- Expense data

Collecting and using your data enables TStat to administer it's recruiting process, including setting up an electronic job applicant HR file; managing your application; conducting assessments; organizing interviews, including arranging or reimbursing for your travel; providing accommodation; processing interview feedback; on-boarding; and conducting background checks and screening. We will process your personal data to meet recordkeeping and internal and external reporting responsibilities. If necessary, your data will also be used in investigations and legal proceedings.

Your personal data is not used for so-called "automated decision-making". We will inform you separately if your personal data is ever made subject to automated decision-making.

In the event of an unsuccessful application, most candidates want us to retain the data they have provided so that we can contact them about other interesting job opportunities at TStat. To make this possible, we ask you at the point of



your first application whether, in the event of an unsuccessful application, you want us to keep the personal data that you provide to us for a period of time and make it available to recruiters within the TStat group. If you consent, our recruiters will be able to consider and contact you for other TStat employment opportunities which may arise. You can revoke your consent at any time by changing the consent settings in your candidate profile.

Where does TStat obtain your personal data?

We obtain most of your personal data from you. We also create personal data about you during the application process (for example, during interviews or via job assessments). Additionally, we collect certain types of personal data about you from third parties, including, for example, from recruitment agencies.

With whom does TStat share your personal data?

Your personal data will only be shared within TStat and its affiliated companies where lawful to do so and for legitimate purposes. TStat takes appropriate steps to ensure that individuals who receive your data are bound to maintain confidentiality of the data.

More specifically, where relevant, your personal data will be shared with:

- all parties whose right of access to such data is recognised by virtue of legal requirements;
- our collaborators and employees entrusted, within the scope of their duties, with the processing of data;
- all those private and/or legal persons, public and/or private entities, when communication of such data is deemed either:
 - o a legal requirement; or
 - o functional to the establishment and management of the employment relationship, for example:
 - external payroll consultant
 - our bank
 - governmental entities
 - private and public entities in the context of a contract/subcontract for public and private contract tenders (in order to also fulfil the obligations arising from joint liability under Art. 29 of Legislative Decree No. 276/2003)

If your application is unsuccessful and you have given us consent to retain your data, we will also share your personal data with recruiters within the TStat group.

Where relevant, we will share your personal data with third parties who act as data controllers in their own right for the purposes described above and in accordance with the data protection laws, including:

- HR services providers
- Insurance providers and brokers
- Governmental organizations or agencies, including law enforcement
- External advisors (such as legal advisors, accountants)
- Employee benefits providers

Does TStat S.r.l. transfer your personal data to countries outside the country/region in which you apply?

On some occasions, for example, when we or one of our service providers have employees or operate equipment in

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other countries or to one of our suppliers should we need to open an account in your name on the supplier's portal, we will transfer your personal data to countries outside the country/region where you work and outside the EEA. For all such transfers, we provide appropriate safeguards through EU Standard Contractual Clauses based on the European Commission's model clauses.

How is your personal data kept secure?

We maintain appropriate technical and organizational measures to protect the confidentiality of your personal data, including security measures to protect against unlawful or unauthorized processing of personal data, and against the accidental loss of, or damage to, your personal data.

How long does TStat S.r.l. store your personal data?

If your application for employment is successful and you commence employment with TStat, your personal data will be maintained consistent with TStat's employee data retention policies.

If your application for employment is not successful and you have not provided consent, we will generally keep your personal data beyond the end of the application process for a limited period of time specific to the country where the job is located (i) to meet recordkeeping requirements, and (ii) for potential use in legal proceedings. We will keep assessment data and master candidate data for a period of up to three years to avoid unreasonable duplications of recruiting efforts.

If your application for employment is not successful and you have provided consent, we will keep your data for up to seven years for the purpose of considering and contacting you for future job opportunities.

What are my rights under applicable data protection laws?

You have the right to request access to, correction, or deletion of your personal data, to ask for data portability and the restriction of processing, as well as – depending on the laws of your country – the right to define instructions on your personal data after your death. You are also entitled to object to the processing of your personal data in certain instances. When we process your personal data based on your consent, you may withdraw your consent for the future at any time. To make a data subject request, please contact us on privacy@tstat.eu. For other general questions and queries on privacy and the applicable privacy rights in your country/region, please contact us as outlined under "Questions and queries?" below. You can also lodge a complaint with a supervisory authority.

Questions and queries?

If you have any questions or concerns about your privacy, please contact TStat S.r.l. hiring contact (or the respective data protection officer, where appointed) or send an email to privacy@tstat.eu.

Our business changes constantly, and our Privacy Notice will change also. If the change is fundamental or will significantly affect you, we will provide you with the updated Notice in advance of the changes taking effect. You can also check this Notice at your convenience to see any recent changes. Unless stated otherwise, our current Notice applies to all information that we have about you. We stand behind the promises we make and will not materially change our policies and practices to make them less protective of candidate personal information collected in the past.