

## PRIVACY POLICY

Consorzio ERP Italia (hereafter "ERP"), with its registered office in Via Roma no. 74 -20051 Cassina dè Pecchi (MI) - Tax code/VAT no. 05495760968, in its capacity as data controller under Art. 13 of EU Reg. 2016/679 (GDPR) provides its information on personal data processing type and extent carried out by this website (hereafter "Site") for those who interact with Site services through consultation or use of its services. Users should consult this policy and other information posted on the Site before disclosing data to ERP. This policy does not cover other websites that the user may consult through links. The services provided by this Site are for those older than 18 years. ERP will delete any data which it confirms has been sent by a minor. Contact details: tel. 02/92147479, fax 02/92592334, email [segreteriaerp@erp-recycling.org](mailto:segreteriaerp@erp-recycling.org)

**1. Navigation data.** As part of their normal operations, the computer systems and software procedures behind this Site may require personal data, which is transmitted as part of the Internet communication protocols. While this information is not collected to be associated with identified data subjects, it could identify users. This data category may include IP addresses, the Site user's domain names, the URI (Uniform Resource Identifier) resource addresses, the request time, the server request method, the file size obtained in response, the numerical code indicating the server status response (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. This data may be used to obtain anonymous statistical information on the Site's use and check that it functions correctly. The data could identify those responsible for crimes against the Site or ERP, except in the latter case, the data on web contacts is not retained for more than 20 days. The data processing legal basis is ERP's legitimate interest in verifying the Site's functionality, security or defending its position before courts.

**2. Data provided voluntarily by users.** The user can send third-party personal data while using some Site services. In these cases, the user acts as an independent data controller, assuming all legal obligations and liabilities, including: 1) ensuring the processing is grounded on one of the legal bases provided for in GDPR Article 6; 2) indemnify ERP in any dispute or claim for damages from data processing by third parties whose data has been processed by the user using the Site functions in violation of data protection regulations. Personal data (name, address, email, contact details, etc.) shared voluntarily, e.g. in a request sent by email to the addresses indicated on the Site, is processed to respond to user requests. The legal basis of the processing is Art. 6 paragraph 1 letter b) of the GDPR as processing is necessary to provide services or respond to user requests (performance of pre-contractual or contractual services). The user is obliged to communicate only the necessary data. The provision of data for these purposes is optional, but failure to do so would make it impossible to activate the Site's services. If the user data falls under one of the "special data categories" (GDPR art. 9: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life, or sexual orientation), users are requested to provide such data only if strictly necessary. Please note that if special data is communicated but there is no user's explicit consent (an eventuality which, however, obviously allows users to send a résumé), ERP cannot be held liable nor receive any complaints as the processing concerns data made public by the data subject (GDPR art. 9 paragraph 2) letter e). In any case, it is emphasized the importance of users expressing their explicit consent to the processing of particular categories of data if they decide to communicate them to ERP. The data is kept for a year after the last message.

**3. Job offers.** The data collected through ERP Jobs (**Work with us**) is used to assess candidates' professional profile before contacting them for interviews. Users/candidates are obliged to communicate only the necessary data. The data processing is based on pre-contractual measures taken at the user/candidate's request (GDPR Article 6 paragraph 1 letter b)). When sending special personal data (GDPR Art. 9 as described above in section 2) without explicit consent to process it, ERP cannot be held liable nor receive any complaints as the processing will be lawful as it relates to data made public by the data subject (GDPR Article 9 paragraph 2 letter e)). In any case, the importance of expressing explicit consent to the processing of particular categories of personal data is emphasized in the event that users / candidates decide to share them. The communication of data is a faculty of users/candidates, the refusal to provide them makes it impossible to send your curriculum vitae. If ERP is not interested in the user/candidate professional profile, it deletes the data when received (after analysing it) or at the interview's conclusion. If it considers the professional profile interesting, but no employment relationship is established, it keeps the data for five years to contact the user/candidate for future possible job interviews. An appropriate privacy notice will be provided if an employment relationship is established.

**4. Receipt of résumés spontaneously sent by users.** The data contained in the curricula received are processed to evaluate the professional profile of the candidates and to contact them to arrange any cognitive interviews. Users/candidates are obliged to communicate only the necessary data. The data processing is

based on pre-contractual measures taken at the user/candidate's request (GDPR Article 6 paragraph 1 letter b)). When sending special personal data (GDPR Art. 9 as described above in section 2) without explicit consent to process it, ERP cannot be held liable nor receive any complaints as the processing will be lawful as it relates to data made public by the data subject (GDPR Article 9 paragraph 2 letter e)). In any case, the importance of expressing explicit consent to the processing of particular categories of personal data is emphasized in the event that users / candidates decide to share them. The communication of data is a faculty of users/candidates, the refusal to provide them makes it impossible to send your curriculum vitae. If ERP is not interested in the user/candidate professional profile, it deletes the data when received (after analysing it) or at the interview's conclusion. If it considers the professional profile interesting, but no employment relationship is established, it keeps the data for five years to contact the user/candidate for future possible job interviews. An appropriate privacy notice will be provided if an employment relationship is established.

**5. Data Recipients** Users' data may be shared with: 1) parties with whom it is necessary to interact to provide the services and who may act as data processors, e.g. hosting providers, other entities belonging to the Landbell Group if their involvement is necessary for the user-requested services (e.g. assessing the professional profile and deciding on hiring/partnership, or managing the information technology systems etc.). 2) subjects, bodies or authorities, independent data controllers to whom communicating users' data is mandatory under legal provisions or authorities' orders. 3) persons authorised by ERP to process the data necessary to provide services through the Site (e.g. ERP employees or partners); 4) ERP Italia Servizi srl for the existing contractual relationship with ERP.

**6. Data transfer to non-EU States.** Data is not transferred outside the European Union, or to an international organisation (an organisation and subordinate bodies governed by public international law, or any other body established by or based on an agreement between two or more States).

**7. Data retention.** ERP processes data for the time necessary to provide the services requested and fulfil contractual and legal obligations. The various retention periods are detailed in the specific information provided. Further information may be requested by writing to ERP.

**8. User rights.** Under GDPR Articles 15 et seq., users have the right to request access to their data, data modification or deletion, processing limitation in the cases provided for by GDPR Art. 18, obtain data in a structured, commonly used and electronically readable format, in the cases provided for by GDPR Art. 20, lodge a complaint with the relevant supervisory authority under GDPR Article 77 (Data Protection Authority) if they consider that the processing of their data is unlawful, make a reasoned request to object to the processing of their data under GDPR Article 21 or withdraw their consent. ERP reserves the right to evaluate requests that would not be accepted if there is a compelling legitimate reason to proceed with the processing that prevails over the interests, rights and freedoms of users.

**9. Modifications.** ERP reserves the right to change the content of this Privacy Policy also due to changes in the law and invites users to review it periodically to be always updated on the data collected and on the use made of it by ERP. This Privacy Policy was updated on 2 March 2021.