

PERSONAL DATA PRIVACY POLICY APPLICABLE TO CANDIDATES

This privacy policy statement of Bending Spoons S.p.A., based in Corso Como 15, Milan (Italy) (hereinafter the “**Data Controller**” or “**Company**”) sets out the procedures followed by us to collect, store and use the personal data concerning you, and acquired through your application to the event First Ascent International 2019, in accordance with Regulation (EU) 2016/679 (the “**GDPR**”) and any other applicable privacy provisions laid down by the European Union, or the member States (collectively, the “**Privacy Provisions**”).

The personal data concerning you shall be processed by us lawfully, fairly and in a transparent manner.

I. Personal Data Controller and Processor

The Personal Data Controller is Bending Spoons S.p.A., based in Corso Como 15, Milan (Italy).

Please email any requests relating to the processing of any personal data concerning you to privacy@bendingspoons.com.

II. Categories of processed data, processing purposes and conditions

The Company shall process the categories of personal data shown below, for the following purposes:

Purpose	Legal basis	Categories of processed data
i. your personal data is processed for the purpose of assessing your profile, qualifications and skills, within the framework of our recruitment policy.	i. processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR); ii. the data subject has given consent to the processing of his or her personal data for one or more specific purposes (art. 6(1)(a) of the GDPR);	i. common data: name, surname, email, data relating qualifications, academic and professional career, assessments and tests, competences and remuneration data; ii. special categories of personal data: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.
ii. your personal data may be processed for the purpose of enabling the Company to organise specific transfers, journeys or events for staff recruitment purposes;	i. processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR); ii. the data subject has given consent to the processing of his or her personal data for one or more specific purposes (art. 6(1)(a) of the GDPR);	i. common data: name, surname, email, ID card and/or passport number; ii. special categories of personal data: data revealing intolerances or religious beliefs;

ii. your personal data may be processed for the purpose of complying with the Company's legal obligations or other obligations arising out of the instructions received from the competent authorities.	Processing is necessary for compliance with a legal obligation to which the controller is subject (art. 6(1)(c) of the GDPR)	common data: name, surname, email, data relating to your qualifications, skills, academic and professional career, assessments and tests, competences and remuneration data, ID card and/or passport number.
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III. Methods, timeframe and place of processing

The personal data concerning you may be processed either electronically or on paper.

The processed data are stored at the Company's headquarters, in the archives provided by our IT services provider. The data collected in connection with your job application shall be processed for the time strictly required to perform the above mentioned purposes, in any case for no longer than 5 years, at the end of which period of time the data shall either be deleted or pseudonymised.

IV. Mandatory or optional nature of the supply of personal data and consequences of the refusal to answer

Your personal data is necessary for processing your job application and without it you will be excluded from the selection procedure.

If your CV contains personal data included in the special categories of personal data - such as, for example, data revealing your ethnic origin, political affiliation or trade union membership - except in the case of spontaneous supply of the said data, or if you are involved in a transfer, journey or event related to the staff selection process, in connection with which you wish to communicate any food intolerances or religious beliefs, the said data may be processed by the Company solely subject to your explicit consent and strictly for the purpose of enabling you to take part in the selection process or the transfer, journey or event. We shall only collect personal data included in the special categories if relevant for assessing your profile, skills, qualifications and professional capabilities, in so far as the said data is absolutely necessary for the establishment of an employment relationship of any kind, or for the completion of the completion of the selection process and provided that the processing does not breach the applicable employment laws and regulations, or if they are provided by you in connection with the organisation of the transfer, journey or event. If you refuse to supply any required data it might prove impossible for us to assess your CV, while there would be no prejudicial consequences for the organisation of the transfer, journey or event.

V. Entities, or categories of entities, to which any personal data concerning you may be disclosed, or which may acquire your personal data, and scope of disclosure of the data

The data supplied by you shall be processed by the following categories of entities:

- a) the personnel authorized by the Company, solely for the purpose of assessing your profile and tests, or organising any transfers, journeys, events, who have received specific processing instructions;

b) third parties carrying out activities that are related or instrumental to the Data Controller's activities, as outsourced data processors engaged by the Company (such as, by way of example only, suppliers providing IT maintenance and development services, IT or filing services providers).

The complete and updated list of the said entities is available for consultation, on request, at the Company's headquarters.

We shall disclose any data concerning you solely for the purpose of discharging the obligations set out in the applicable laws and regulations.

VI. Sharing your personal data with Countries outside the European Economic Area

Any personal data concerning you could also be transferred to third-party entities based outside the EEA, to fulfil the purposes mentioned above.

In these cases the Company undertakes to put into place appropriate measures to ensure adequate protection of those personal data in the place of destination, verifying that the third-party entities are Privacy Shield certified or comply with the rules laid down by the competent authorities or have entered into specific agreements with the Companies, in this respect.

A copy of the appropriate or expedient warranties are available for consultation, on request, at the Company's headquarters.

VII. Your privacy rights

You may contact the Data Controller, in writing, by means of a registered letter with proof of receipt addressed to the Company's headquarters, or an email to privacy@bendingspoons.com, to exercise your rights to access, modify, delete or object to the processing of your personal data (as set out in the Privacy Provisions), or to obtain:

- i. confirmation of any personal data concerning you, even if they have not yet been registered, and its communication in an intelligible form;
- ii. information about the origin of the data, the processing purposes, the categories of the relevant personal data, the Data Controller and processor, the entities, or categories of entities, to which the data may be disclosed or which may acquire the data as data processors or entities engaged and authorised to process your data, and the storage time or, if this is not possible, the criteria for its determination;
- iii. the updating, rectification or completion of the data concerning you, the erasure¹, the pseudonymisation or blocking of any data processed in breach of the law, including those the

¹ In particular, you are entitled to the so-called "right to be forgotten": the right to obtain from the controller the erasure and blocking of any further processing of any personal data concerning you that are no longer necessary for the purposes for which they were collected or otherwise processed, if you withdraw your consent or object to the processing of any personal data concerning you, or if the processing is in breach of the GDPR. The Data Controller undertakes to inform the other data controllers engaged in processing the data concerning you to erase any links to the said data or copies or reproductions of the said personal data, taking into account the available technology and the means available to the Data Controller, including any technical measures.

The further retention of the personal data concerning you is lawful where it is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, on the grounds of public

storage of which is unnecessary for the purposes for which they were collected or subsequently processed, the certification that the required activities have been notified, also with regard to their contents, to the entities to which the data has been communicated or disclosed, except where this requirement is impossible to perform or entail the use of manifestly disproportionate resources compared to the protected right.

Furthermore, you may also request the restriction of processing of any data concerning you and the transfer of your data to a different controller (the so-called “right to data portability”²) and to object, for legitimate reasons, to the processing of any data concerning you, even if relevant to the collection purposes, or object, in full or in part, to the processing of any personal data concerning you (in relation, *inter alia*, to any specific means of communication) for the purpose of sending any advertising materials or direct sale or market surveys or commercial communication, subject to the fact that the Company does not intend to process your data for such purposes.

You also have the right to lodge a complaint with the Italian Data Protection Authority and/or other competent control authorities.

interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or for the establishment, exercise or defence of legal claims.