

We are aware of how important it is to you that the methods of using and sharing information about you are scrupulous and responsible and we will process your data in such a manner. This privacy policy describes how we collect and process your personal data in the capacity of "**Data Subject**". All processing is carried out in line with what is established by Regulation EU 2016/679 (hereafter GDPR) and domestic regulations in that regard.

Data Controller and Data Protection Officer (DPO)

The Data Controller defines the purposes of the personal data processing and, after having collected them, "uses" them in accordance with the principles ratified by the GDPR. The Controller of your personal data is Lutech S.p.A.

Lutech S.p.A. has appointed a Data Protection Officer, who can be contacted at the following email address: DPO@lutech-group.com.

Legal Basis and Purposes of the Processing

The legal basis on which the processing is carried out is your free consent, optional but strictly necessary to be able to proceed with the legal formalities related to your possible recruitment. Any refusal will therefore prevent you from participating in the selection as we will be unable to assess the work skills of candidates without processing the requested personal data. In the awareness of the importance of your data, we guarantee that we will process them, using electronic and/or paper tools, adopting all "adequate" security measures to protect them despite guaranteeing their free movement.

Your data must be collected and "used" to allow us to assess correctly your previous studies and work experience. The table below, as well as summarising the data that will be processed and the purposes of the processing, illustrate the persons who may enter into contact with your data.

Purposes of the processing	Categories of Personal Data	Categories of Recipients:
Search and selection linked to possible recruitments	<ul style="list-style-type: none">• Common data including personal details (including the family unit), residential address, telephone numbers and email, curriculum vitae	<ul style="list-style-type: none">• Employees of Lutech S.p.A. who, due to the role or function exercised, process your data to carry out their duties• Employees of the Lutech Group companies who, due to the role or function exercised, process your data to carry out their duties

Transfer of Personal Data

Your data will not be subject to any transfer outside the EU and will only be transferred for the purposes listed above for Lutech S.p.A. and the group companies.

Security Measures

All data that you provide to us will be processed according to principles of lawfulness, fairness and transparency, in line with the company policies on security. We guarantee an "adequate" security level in respect of the GDPR and of domestic regulations in that regard but above all the security of your personal data.

Should there be even only a particular risk of breach, we will communicate it promptly to you.

Rights of the Data Subject

The GDPR, as well as guaranteeing the right to lodge a complaint with the Supervisory Authority, which, for Italy, is the Autorità Garante per la protezione dei dati personali, grants to you the following rights:

- **Right of access** (art. 15): The Data Subject may obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed and may obtain further information, including the purposes of the processing, the categories of personal data and the recipients.

- **Right to rectification** (art. 16): The Data Subject may obtain from the Controller the rectification of inaccurate personal data.
- **Right to erasure** (art. 17): The Data Subject may request the erasure of personal data concerning him or her where one of the grounds provided by that article applies, including: withdrawal of consent, unlawful processing and exercise of the right of defence.
- **Right to restriction** (art. 18): The Data Subject may obtain the restriction, configurable as a total or partial suspension of the data processing or even in some cases an immobilisation of the same. This may be requested only in exceptional cases expressly determined by the rule, including the period enabling the controller to verify the accuracy of the personal data, unlawful processing, exercise of a right during judicial proceedings.
- **Right to data portability** (art. 20): The Data Subject has the right to ask that the data concerning him or her are transmitted, in the exercise of his or her rights, in an easily comprehensible format.
- **Right to object** (art. 21): The Data Subject may, on grounds related to his or her particular situation, object to the processing concerning him or her pursuant to Art. 6 paragraph 1, points e) and f).
- **Right not to be subjected to automated processes** (art. 22): The Data Subject may object to being subject to a decision based solely on automated processing which produces legal effects concerning him or her or similarly significantly affects him or her.

We inform you that if you decide to exercise one or more of the above rights, your personal data will be communicated by the Controller to the processing recipients for the connected fulfilments (art. 19 of the GDPR).

If you have any doubts or require clarifications and also to exercise your rights, please contact us by writing to the following address: <https://lutech.group/privacy-rights>

Personal data storage time

Depending on the methods of providing your candidacy, your data will be stored as follows:

Delivery methods	Filing procedure	Storage periods
Manually, on paper (e.g. recruiting events, etc.)	PAPER	maximum 36 months
Candidacy or self-candidacy by email and redirected to the company database (Allibo platform)	ELECTRONIC on Allibo platform	maximum 24 months
Candidacy to positions opened on the company database (Allibo platform)	ELECTRONIC on Allibo platform	maximum 24 months

Once the storage period has elapsed, for paper archiving your personal data will be erased securely, while in other circumstances you will be asked, via the Allibo platform, if you wish to keep your data in our database. If you give a negative response or remain silent, the data will be automatically erased.