

PRIVACY POLICY FOR APPLICANTS

This Privacy Policy for Applicants (the “**Policy**”) applies to the processing of your personal data by Bending Spoons S.p.A. (“**Bending Spoons**”, “**our**”, “**we**” or “**us**”) through job or recruiting events applications and job vacancy advertisements in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation (“**GDPR**”), the Italian Legislative Decree 196/2003 (as amended), Directive 2002/58/EC – ePrivacy Directive, and other applicable local laws (the “**Data Protection Laws**”). This Policy does not apply to the processing of applicants’ data after they are hired and during their employment.

1. Data Controller

The data controller is Bending Spoons S.p.A., with registered office in Corso Como 15, Milan (Italy). If you have any requests regarding the processing of your personal data, please email us at privacy@bendingspoons.com.

2. Data Protection Officer

You can contact our Data Protection Officer at dpo@bendingspoons.com for any request relating to the processing of your personal data or this Policy.

3. Purposes and Legal Bases

We will process the categories of personal data shown below, for the purposes and upon the legal bases indicated below:

Purpose	Legal basis	Categories of data
a. Your personal data is processed for the purpose of assessing your profile, qualifications and skills, within the framework of our recruitment policy.	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). Processing is also necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law (art. 9 (2) (b) of the GDPR). You have consented to the processing of your personal data for one or more specific purposes (art. 9(1)(a) of the GDPR).	Common data: name, surname, email, information relating to your qualifications, skills, academic and professional career, assessments and tests, skills and remuneration. Special categories of personal data: data related to your health, data revealing disabilities, data concerning sexual orientation, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.
b. Your personal data may be processed for the purpose of the	Processing is necessary for the performance of a contract to which you are party or in	Common data: name, surname, email, ID card or passport number.

<p>organization and booking of transfers, trips or events for the recruiting process.</p>	<p>order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).</p> <p>You have consented to the processing of your personal data for one or more specific purposes (art. 9(1)(a) of the GDPR).</p>	<p>Special categories of personal data: data revealing food intolerances or religious beliefs.</p>
<p>c. Your personal data may be processed for the purpose of complying with our legal obligations or other obligations arising out of the instructions received from the competent authorities.</p>	<p>Processing is necessary for compliance with a legal obligation to which the data controller is subject (art. 6(1)(c) of the GDPR).</p> <p>Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law (art. 9 (2) (b) of the GDPR).</p>	<p>Common data: name, surname, email, data relating to your qualifications, skills, academic and professional career, assessments and tests, competences and remuneration data, ID card or passport number.</p> <p>Special categories of personal data: data related to your health, data revealing disabilities, data concerning sexual orientation, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.</p>

4. Data Retention

The data collected in connection with your application will be processed for the time necessary to carry out the purposes mentioned above. If you are not selected for the vacancy or recruiting event you applied for, we might retain your data for longer to consider your candidacy for other suitable positions that we may open in the future, and in any case up to one year from the date of your original application.

5. Your Choices

Your personal data is necessary for us to process your application. If you do not provide such data, we will not be able to evaluate your candidacy and we will have to exclude you from the application process. If your application or CV contain special categories of personal data (for example, data revealing your health, your ethnic origin, sexual orientation, religious belief, political affiliation or trade union membership), we will only process such data strictly for the purpose of enabling you to take part in the recruiting process, and to comply with labour laws and regulations. With your prior consent, we may also process special categories of personal data when booking or organizing transfers, trips or events in connection with the recruiting process. Moreover, we may also collect personal data included in the special categories when you spontaneously share such data, or if you are involved in transfers, trips or events related to our recruiting process and for which you wish to tell us about your possible food intolerances or religious beliefs.

We may process data relevant to evaluate your candidacy, including your skills, qualifications and professional capabilities in compliance with applicable labour laws and regulations, and only if such

data is necessary for the establishment of an employment relationship of any kind or for the recruiting process. We may also process data when you spontaneously share it with us in connection with recruiting-related transfers, trips or events. If do not provide us with any data required for these purposes, we may not be able to evaluate or consider your candidacy, while there would be no detrimental consequences for you in connection with recruiting-related transfers, trips or events. However, please note that we take no responsibility for any event related to your refusal to provide us with information such as food intolerances and, for example, the catering does not suit your dietary restrictions.

6. With Whom We Share Your Data

We may share your data with our contractors, service providers, consultants and commercial partners as well as any competent judicial, administrative or regulatory authority.

7. Transfers of Data

Any personal data concerning you could also be transferred outside of the European Economic Area (“**EEA**”). In these cases, we will take appropriate safeguards to ensure adequate protection of your personal data in the place of destination, verifying that data is transferred to a country ensuring an equivalent level of protection of data than that set under the GDPR. Alternatively, we will adopt adequate safeguards, for example, by entering into specific agreements with the recipients of the data, including the model clauses of the EU Commission, by verifying the recipient is Privacy Shield certified (only for transfers towards the United States), or other guarantees are in place (such as binding corporate rules). A copy of the appropriate, or expedient warranties are available for consultation, on request, at the Company’s headquarters.

8. Your Privacy Rights

You have the following rights, as specified in the GDPR:

- the right of access to your personal data
- the right to obtain the updating or rectification of your personal data
- under certain conditions pursuant Data Protection Laws, the right to obtain the cancellation of your personal data ("right to be forgotten"), the right to restrict the processing of your personal data, and right to data portability
- the right to object to the processing of your personal data under legitimate grounds
- where the processing is based on your consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal

To exercise your rights, you may contact us, in writing by sending a letter to our headquarters, or by sending an email to privacy@bendingspoons.com.

You also have the right to lodge a complaint with the Italian Data Protection Authority or the competent national data protection or judicial authority.

9. Changes

We may modify or update this Policy, also in view of future changes in the Applicable Data Protection Laws or in case we implement new features or functionalities that will process personal data.

Last updated: 13 April 2021