

# Personal data processing policy for Job Applicants and Participants in any other selection procedure

Pursuant to the EU Regulation 2016/679 on the protection of individuals  
with regard to the processing of personal data.

*In accordance with the obligations set out under EU Regulation 2016/679 on the protection of individuals with regard to the processing of personal data (the “**Regulation**”), we hereby intend to inform you that Satispay S.p.A. (see <https://www.satispay.com/en-it/corporate/> to see the details of Satispay S.p.A. and the other group companies) is the Data Controller of your personal data which are processed in the context of the management of your application for a job or your participation in any other selection procedure which is not intended for hiring workforce (such as, the selection procedure to become Brand Ambassador) with Satispay S.p.A.*

*Should you apply for a job position or any other selection procedure at a different group company (please see the link above with all the company details of the Satispay group companies), your data will be transferred to that different company which will act as the Data Controller of your personal data processed in the context of the management of your application.*

*Satispay S.p.A. and the other group companies (hereafter both intended as “**Satispay**”) have also appointed a data protection officer that the job applicant can contact at [dpo@satispay.com](mailto:dpo@satispay.com) in order to receive information on the processing of his/her personal data or on the rights that he/her is entitled to exercise.*

*In particular, the processing shall follow the principles of fairness, lawfulness and transparency. The personal data will be relevant, complete and not excessive in relation to the purpose for which they will be processed and they will be collected and registered for the sole purposes indicated in this Policy.*

## **1.0 WHICH PERSONAL DATA ARE PROCESSED?**

This concerns mainly the data inserted in the specific registration form or otherwise provided during the selection procedure, such as, for example: name, surname, email, address, mobile phone number, data related to your school and professional education reported on the CV possibly submitted or subsequently communicated.

## **2.0 FOR WHICH PURPOSES ARE YOUR PERSONAL DATA PROCESSED?**

Satispay will process your personal data for the following purposes:

- a) fulfil the obligations provided by the applicable law;
- b) follow up the operations concerning the carrying out of the management procedure related to the single application. For such purpose, the data will be processed in the context of the HR and staff management activities;
- c) follow up any selection procedure which is not intended for hiring workforce (such as, the selection procedure to become Brand Ambassador) which you applied for.

Furthermore, the personal data collected may be processed in the context of possible corporate events (transfer of the company or of business units), due diligence, defence of legal claims and preliminary actions.

## **3.0 ON WHICH BASIS ARE YOUR PERSONAL DATA PROCESSED?**

Without prejudice to any legal obligation for the purposes referred to in paragraph 2, letter a), the processing activities of your personal data, provided for the purposes referred to in paragraph 2, letters b) and c), are necessary in order to carry out the pre-contractual measures adopted on your request at the moment of your application for a job position – when you submit your CV – or any other selection procedure which is not intended for hiring workforce (such as, the selection procedure to become Brand

Ambassador) with Satispay. The denial to provide the data for the purposes listed above will result in the impossibility to carry out the selection procedures related to your application.

In the event of processing in the context of possible corporate events (transfer of the company or of business units), due diligence, in the event of a defence of legal claims before the courts and in relation to the relevant preliminary actions, such processing will be carried out on the basis of the legitimate interest of Satispay to continue its commercial activities and to protect its rights.

#### **4.0 HOW ARE YOUR PERSONAL DATA PROCESSED?**

The processing of personal data referred to in the previous points will be carried out manually, both on paper and electronic devices suitable to safeguard the security and confidentiality of the data, in any case by persons specifically appointed for the purpose.

#### **5.0 WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?**

Your personal data will be accessible by subjects authorized to their processing in the context of the staff, administrative and legal management of Satispay or of the companies of the Satispay group. A company of the Satispay group, relying on its own legitimate interest or of another group company, may communicate your personal data to a different group company only for the purpose of managing your application. The personal data may be communicated by Satispay only and exclusively for the indicated purposes and, if necessary, to the following categories of subjects:

- external consultants for the recruitment, selection and evaluation of the staff, for the litigation management and for the legal assistance;
- firms and companies in the context of assistance and consultancy, in relation to the aforementioned relationships;
- companies providing for platforms and ICT tools with which your application is managed.

The data will not be disclosed to undetermined subjects.

With reference to the personal data communicated to them, the subjects belonging to the above mentioned categories may operate, as the case may be, as data processors or as separate data controllers. In the latter case, the personal data will be communicated only with the express consent of the job applicants, except for the cases in which the communication is mandatory or necessary pursuant to the law, or for the achieving of the purposes for which the consent of the data subject is not required by law.

#### **6.0 HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

Your personal data will be retained in accordance with the provisions set out under the applicable law, for a period of time not exceeding that necessary to achieve the purposes for which they are processed. The criteria to determine the retention period of such data take into account the allowed processing period and the applicable legislation on limitation period of rights, and the legitimate interests that constitute the legal basis of the processing.

Subsequently the data will be erased, aggregated or anonymised.

Data relating to rejected applications will be deleted at the end of each selection procedure.

## 7.0 WHAT ARE YOUR RIGHTS?

The Regulation grants you the exercise of specific rights, including the right to ask to the data controller, where applicable:

- the confirmation to whether or not personal data concerning him or her are being processed and, in this case, to obtain access to these data (right of access);
- the correction of inaccurate personal data or the integration of incomplete personal data (right to rectification);
- the erasure of your personal data, where one of the grounds provided by article 17 of the Regulation applies (right to erasure);
- the restriction of processing of your personal data, where one of the grounds provided by article 18 of the Regulation applies (right to restriction of processing);
- the objection to the processing of your personal data on grounds relating to your particular situation (right to object);
- to receive the personal data provided by you in a structured, commonly used and machine readable format, and to transmit this data to another data controller (right to data portability).

Furthermore, you have the right to withdraw your consent to the processing of your personal data (where given) at any time without affecting the lawfulness of processing based on consent given before your withdrawal.

To exercise your rights you can send a request at [dpo@satispay.com](mailto:dpo@satispay.com).

Pursuant to the Regulation, Satispay is not permitted to charge a fee to fulfil one of the requests listed in this paragraph, unless it is manifestly unfounded or excessive, and in particular if it has a repetitive character. If you request additional copies of your personal data or in the event of excessive or unfounded requests, Satispay may (i) charge a reasonable fee, taking into account the administrative costs incurred in fulfilling the request or (ii) refuse to fulfil the request. In this case Satispay will inform you about the costs before fulfilling the request.

Satispay may ask further information before fulfilling the requests in the event a verification of the identity of the individual that submitted the requests is necessary.

Without prejudice to any other administrative or jurisdictional appeal, the job applicant has also the right to lodge a complaint with the competent supervisory Authority where he/she deems that the processing of his/her data is carried out in violation of the General Data Protection Regulation. For the list of the competent data protection authorities, please visit:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

In any case, Satispay is interested in being informed of possible reasons of claim and invites to use the abovementioned contact channels before bringing an action before the supervisory Authority, in order to prevent and solve any dispute in a friendly and prompt way.