



## **PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA**

pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)

### **1. Identity and Contact Information of the Data Controller**

The Data Controller for the personal data of users of the website <https://www.arrasgroupspa.com/> (the Users and the Website) is Arras Group S.p.A., with its registered office located at Largo Domodossola 7, Milan, VAT no. 11311540964 (hereinafter referred to as the Data Controller).

### **2. Types of Data Processed**

#### *Browsing Data Automatically Collected by the Website*

Whenever Users access the Website, the computer systems and software procedures that enable its operation automatically acquire, during their normal course of operation, access and browsing data (Browsing Data). This information is collected automatically by the Website and, in the case of profiling cookies, requires specific authorization from the User.

The Website employs technologies for the direct acquisition of personal data that can identify the User, such as "cookies." For detailed information about the cookies active on the Website and related data processing, please see the Cookie Policy section in point 7.

#### *Data Provided by Users*

The personal data processed includes Users' personal and contact details (e.g., name, surname, email address, telephone number – the Identification Data) as well as, through the "Work with Us" section of the Website, date of birth, residential address, education, work experience, academic and training background, and any data falling under special categories (personal data revealing racial or ethnic origin, political opinions, trade union membership, or data concerning health status, such as belonging to protected categories under Law 68/1999 – the Special Data). The Identification Data and Special Data are collectively referred to as Communicated Data.

Users are advised not to provide Communicated Data unless absolutely necessary for the purposes described in section 3 below. Should any non-relevant Communicated Data be included in the contact form or CV submitted by the User, the Data Controller will refrain from using such information.

For convenience, Browsing Data and Communicated Data are collectively referred to as Data.

### **3. Purposes and Legal Basis of Data Processing**

#### *Browsing Data*

Browsing Data, in an aggregated form that does not allow for User identification, will be used for the following purposes:

- (i) to monitor the proper functioning of the Website;



(ii) for statistical purposes to understand how the Website is used by Users and to improve accessibility and attractiveness;

(iii) to detect any technical issues as soon as possible and improve navigation within the Website. Non-aggregated Browsing Data is processed for profiling Users, as specified in the cookie policy, and only with the Users' consent.

The processing of Browsing Data is based on the Users' consent (regarding data collected via third-party profiling cookies) and the legitimate interest of the Data Controller in improving the Website's usability for Users (regarding data collected through technical and analytical cookies). This interest has been balanced against and found to be compatible with that of the Users, as it enables them to benefit from a more efficient and optimized Website.

Users may, at any time, object to the processing of Browsing Data or revoke their consent through the cookie management panel or by contacting the Data Controller at the contacts provided in point 2 below. In any case, revoking consent or objecting will not affect the lawfulness of the processing carried out by the Data Controller up until that point.

The processing of Browsing Data is optional and not required, except for Browsing Data processed through the installation of technical cookies: navigation on the Website is only possible through the processing of Browsing Data collected via technical cookies; the lack of consent for the installation of analytical and/or profiling cookies will not prevent the User from browsing the Website.

#### Communicated Data **Handling of Requests**

Identification Data will be processed to respond to Users' requests submitted through contact forms available on the Website.

Processing of Identification Data for this purpose is necessary, on the one hand, to meet the legitimate interest of the Data Controller in responding to Users to provide its services and information about them. This interest has been weighed against the Users' expectations and is considered compatible with their reasonable expectation of receiving a response to their inquiries. On the other hand, it is necessary for pre-contractual and contractual measures taken at the User's request (particularly concerning the potential conclusion of rental and property sale agreements), and, if applicable, for compliance with legal obligations.

If no pre-contractual or contractual relationship results between the Data Controller and the User, Users may, at any time, object to such processing by writing to the Data Controller at the contacts provided in point 6 below. Any objection will not affect the lawfulness of processing carried out up to that point but will result in the deletion of all Identification Data and the inability to follow up on any pending requests. Providing Identification Data for this purpose is voluntary but necessary: refusal will prevent the Data Controller from responding to requests, providing information to the User, and potentially establishing a contractual relationship with the Data Controller.

#### **Sending Communications for Marketing Purposes**

Identification Data will be processed to enable the Data Controller to send Users commercial and promotional communications related to the activities conducted by the Data Controller, to arrange



meetings, and possibly evaluate the opportunity to establish a contractual relationship.

Processing of Data for this purpose is legitimized by the freely given consent of the User.

Users may, at any time, revoke their consent by following the procedure indicated in each communication or by writing to the Data Controller at the contacts provided in point 6 below. Revocation will not affect the lawfulness of the processing carried out up to that point but will result in the immediate cessation of marketing communications.

Providing Data for this purpose is voluntary, and the processing is optional: refusal will have no consequences, even in the case of a subsequent commercial relationship with the Data Controller.

### ***Evaluation of Applications***

Data provided through the "Work with Us" section of the Website is processed to carry out the candidate selection process aimed at potentially establishing an internship, traineeship, or employment relationship with the Data Controller and/or other companies in the Arras Group.

Processing of Communicated Data is necessary to execute pre-contractual measures at the data subject's request, comply with specific obligations, and perform specific tasks required by law related to establishing an employment relationship. Processing Special Data is based on the provisions concerning the processing of special categories of data, pursuant to Article 21, paragraph 1 of Legislative Decree August 10, 2018, n. 101, issued by the Data Protection Authority on June 5, 2019 (Official Gazette General Series n. 176 of July 29, 2019).

Processing of Communicated Data for this purpose is voluntary but mandatory and necessary for the proper selection of candidates. Any partial or total refusal to provide Communicated Data will prevent the Data Controller from considering the application and adequately assessing the professional profile of Users for a potential internship, traineeship, or employment relationship with the Data Controller. It should be noted that for Communicated Data related to employment with other companies in the Arras Group, the Data Controller acts on their behalf; therefore, the Arras Group company receiving the CV submitted through the Website will provide its own privacy notice regarding personal data processing.

#### **4. Recipients of Data**

Communicated Data will be accessible, for the purposes described in section 3 above, to employees and collaborators of the Data Controller, as well as the company based in Italy responsible for managing the Website on behalf of the Data Controller, in its capacity as a data processor under a specific data processing agreement signed with the Data Controller.

In no other case will Data be disclosed to third parties unless necessary to comply with requests from the Judicial Authority, Public Security, or another Public Authority.

The complete list of Data recipients is kept at the Data Controller's registered office and can be consulted upon request by contacting the Data Controller at the contacts provided in point 6 below.

#### **5. Methods of Processing and Data Retention Period**

The Data Controller will process Data with and without the use of electronic, IT, or automated tools. The



Data Controller has adopted specific and adequate logical, organizational, and technical security measures to prevent the loss of Data, illegal or unauthorized use, and unauthorized access.

Data will not be processed and retained by the Data Controller for a period longer than is strictly necessary to achieve the purposes for which it was collected (see point Error. Reference source not found. in this notice) and, in particular:

- (i) Aggregated and anonymized Browsing Data will not persist for more than two years;
- (ii) Clear Browsing Data, for profiling purposes, will not persist for more than 90 days and will be deleted or anonymized at the end of this period;
- (iii) Communicated Data will be retained:
  - for evaluating applications, for a maximum period of 12 months from receipt of the CV;
  - for responding to User requests, for a maximum period of 12 months from the last contact. If a contractual relationship is established between the User and the Data Controller, the Communicated Data will be processed for the period indicated in the relevant privacy notice provided with the contract;
  - for sending communications for marketing purposes, for a maximum period of 12 months from the granting of consent; if the User responds positively to a request sent before the expiry of this term, processing for this purpose will be carried out for a further period of 12 months. Data will be retained for a longer period if necessary to comply with legal obligations or to ensure judicial protection of the rights of the Data Controller.

## 6. User Rights and Contacts for Exercising Rights

Users, as data subjects, have the right, at any time, to:

- (i) access their Data;
- (ii) request and obtain the correction and/or updating of Data;
- (iii) request and obtain the deletion and limitation of processing;
- (iv) revoke their consent or object to the processing of Data, according to the methods described in section 3 above, without prejudice to the lawfulness of the processing carried out before the objection.

To exercise the rights listed in points (i) – (iv), Users can always contact the Data Controller at the following addresses:

- email: [•];
- postal mail: [•].

Furthermore, Users can always lodge a complaint with the Data Protection Authority.

## 7. Cookie Policy

Cookies are small text strings that the apps or websites visited by the User send to the browser on their device, where they are stored to be sent back upon the User's next visit. While browsing the Website, the



User may receive "first-party" cookies on their device, managed directly by the Data Controller and/or the Website operator, and also cookies sent by different websites or web servers (so-called "third-party cookies"): these are cookies set by a website other than the Website.

Regarding the purposes pursued, cookies can be technical, analytical, or profiling. The Website uses the following cookies for the purposes indicated below.

### **Technical Cookies**

Technical cookies are used solely to transmit a communication over an electronic communications network or to the extent strictly necessary for the provider of an information society service to provide a service explicitly requested by the User.

Technical cookies active on the Website can be divided into navigation or session cookies, which ensure normal navigation and use of the Website. These cookies include functionality cookies, which allow the Website to remember choices made by the User to improve the service provided to the User. The installation of such cookies does not require the prior consent of the Users.

The following technical cookies are active on the Website:

Cookie	Domain	Purpose	Duration
_cookiepolicy	<a href="http://www.arrasgroupspa.com">www.arrasgroupspa.com</a>	Keeps track of the User's choice regarding profiling cookies installed via the Website	1 year

### **Analytical Cookies**

Analytical cookies are used to collect information, in aggregate form, without identifying users, on the number of Users and how they navigate the Website.

The following third-party analytical cookies are active on the Website:

Cookie/Provider	Domain	Purpose	Duration
_ga	Google	.arrasgroupspa.com	Analytics
_gid	Google	.arrasgroupspa.com	Analytics

### **Profiling Cookies**

These cookies allow the creation of an anonymous profile of Users based on their browsing experience on the Website.

The following third-party profiling cookies are active on the Website:

Cookie/Provider	Domain	Purpose	Duration	Deletion Method
_fbp	Facebook	.arrasgroupspa.com	Identifies browsers to provide advertising and site analytics services	3 months