

PRIVACY NOTICE

(Pursuant to Articles 13 and 14 EU Regulation 679/2016)

1. DATA CONTROLLER AND DATA PROTECTION OFFICER (RPD/DPO)

The Data Controller of your personal data is E-Play24 ITA Limited (also "E Play 24", "The Controller" or "the Company"), having its registered office at Business Plaza, Level 1, Office 3, Triq Ghar Il-Lembi Sliema, SLM1605 Malta, which can be contacted at the e-mail address privacy@e-play24.it. The Data Protection Officer (DPO) can be reached at dpo@e-play24.it.

E-Play24 ITA Limited, in its capacity as Data Controller of your personal data, hereby informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

Your personal data will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations therein.

2. PURPOSE AND LEGAL BASIS OF PROCESSING

Your data that will be processed are your so-called identification data (name and surname, place and date of birth), your so-called contact data (home address, e-mail address, telephone number), as well as any other data that could potentially be included in a *curriculum vitae*, such as your image or data relating to previous work experience.

Your data will be processed for the purpose of assessing and, therefore, identifying potential candidates for selection interviews, aptitude tests or related activities aimed at the establishment of a working relationship and/or the promotion of job offers from other Companies of the Group, relating to the same professional figure. The legal basis for such processing therefore lies in the execution of pre-contractual measures *pursuant to* Article 6(1)(b) GDPR.

In the pursuit of the aforementioned purposes, the Data Controller may become aware of special categories of personal data and in detail: racial or ethnic origins, membership of protected categories, data concerning health. The legal basis for the processing of these types of personal data lies in Article 9(2)(b) of the GDPR, given that the processing is necessary to fulfil the obligations and exercise the specific rights of the Data Controller or the Data Subject in the field of employment and social security and social protection law.

E-PLAY24 ITA LIMITED

E-Play24 ITA Ltd, Piazzetta Business Plaza Level 1, Office 3, Triq Ghar Il-Lembi, Sliema, SLM1605, Malta

VAT: MT 20357525 - Company Registration Number C52511

<https://corporate.eplay24.it/>

We would like to inform you that the provision to the Data Controller of relevant and pertinent personal data is not compulsory by law, but your refusal to provide such data could make it impossible for the Company, in relation to the relationship between the data and the company's specific selection requirements, to correctly assess your position for the purposes of the selection itself and consequently make it impossible for the company to manage your possible candidature.

Lastly, your *curriculum vitae* may be processed by the other Companies of the Group in order to assess your suitability for open positions with them. The legal basis legitimizing the processing of your personal data for the pursuit of the aforementioned purposes lies in Article 6(1)(f) of the GDPR: in fact, it is based on the legitimate interest of the Data Controller.

3. METHODS OF TREATMENT

Pursuant to Articles 13 and 14 of EU Reg. 679/2016, we inform you that the personal data you have communicated to the Data Controller, or which have been received by the latter from third party companies or external *headhunters* are entered into the Company's database and processed by computer or manual procedures. Please note that personal data is collected and requested exclusively for the purpose of the selection and evaluation of the Candidate. The relative evaluation of the Candidate, in any case, refers only to information regarding training, education, previous experience, and all that is pertinent to the candidate's profile. All processing is carried out in compliance with the modalities set out in Article 32 of the GDPR and through the adoption of the appropriate security measures.

Finally, your data will only be processed by staff expressly authorized by the Data Controller or by Data Processors who need to process them in order to carry out the tasks and functions entrusted to them. You can request the list of external managers from the following e-mail address privacy@e-play24.it.

4. EXTRA-EU TRANSFER

Your data may be transferred to countries outside the European Economic Area. In such cases, processing is legitimate since it is based on adequate guarantees such as the standard contractual clauses referred to in Article 46(2)(c) GDPR, signed between the Company, as exporter, and the importer.

5. DISSEMINATION AND COMMUNICATION

Your data will not be disclosed. The Controller may communicate, within the framework of the selection of professional profiles, the personal data of its candidates to the following categories of recipients (among which, some appointed as data processors):

- consultants and freelancers, also in associated form;

- within public and/or private entities for which the disclosure of data is mandatory or necessary in order to comply with legal obligations or is in any case functional to the possible establishment of the relationship;
- armed forces;
- police force;
- Group companies to enable them to be assessed in relation to professional profiles sought by them.

6. RETENTION PERIOD

We would like to inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to Article 5 of the GDPR, your personal data will be kept for the time necessary to fulfil contractual purposes and legal obligations, and in any case for a maximum period of 24 months from the sending of your Curriculum Vitae or, in any case, from the acquisition of the data.

7. RIGHTS OF THE DATA SUBJECT

As a data subject, you may exercise your rights under Articles 15 et seq. of the GDPR.

In particular:

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him/her exists and communication of such data in intelligible form, as well as access to the following information (Art. 15):
 - a) the purposes and modalities of the processing;
 - b) categories of personal data;
 - c) if possible, the retention period;
 - d) the logic applied in the event of processing carried out with the aid of electronic instruments;
 - e) of the entities or categories of entity to whom or which the personal data may be communicated or who or which may become aware of them in their capacity as designated representative(s) in the territory of the State, data processor(s) or person(s) in charge of processing.
 - f) the identification details of the holder, the persons responsible and the representative designated pursuant to Article 5(2).

If several copies are requested, the Holder may charge a reasonable fee based on administrative costs.

2. The data subject has the right to obtain:
 - a) updating, rectification or, where interested, integration of the data (Art. 16);
 - b) the cancellation, transformation into anonymous form or blocking of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed (Art. 17);
 - c) limitation of processing (Art. 18);

- d) a declaration that the operations referred to in letters a), b) and c) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except where this proves impossible or involves a manifestly disproportionate effort compared with the right protected (Art. 19);
 - e) data portability (Art. 20).
3. The data subject has the right to object, in whole or in part:
- a. for legitimate reasons for the processing of personal data concerning him/her, even if pertinent to the purpose of collection;
 - b. the processing of personal data concerning him/her for the purposes of direct sales or for the performance of market research or commercial communication.

The above-mentioned rights may be exercised by sending a request in writing by e-mail to privacy@e-play24.it.

The data subject also has the right to lodge a complaint with the Supervisory Authority if he or she considers that the processing concerning him or her violates the requirements of the GDPR to protect his or her personal data (Art. 77).

The Data Controller E-Play24 ITA Ltd