

**Subject: DISCLOSURE and declaration of CONSENT - EMPLOYEES - relative to the processing of personal data in accordance with and pursuant to art. 7, 13 and 14 of EU Regulations 2016/679 (GDPR) and current national regulations.**

Dear Sir/Madam,

**COMPAGNIA SIDERURGICA ITALIANA S.r.l.** (hereinafter referred to as “COMPAGNIA SIDERURGICA ITALIANA”, the “Company” or the Official in Charge of Data Processing”) recognises the importance of the protection of personal data and is pro-actively committed to processing it in a responsible way, and in a way consistent with both EU Regulations 2016/679 (GDPR) and current national regulations.

To such an aim, this disclosure describes the practices related to Privacy which are applicable to the personal information that we collect, use and if necessary share to allow us to set up an employment relationship, or if this is already in place, its management.

In order to guarantee a coherent and high level of protection of the above-mentioned data, we wish to get you up to date in your role as the “Interested Party” (that is, the person to whom the data to be processed relates) about the technical and managerial measures taken by the Company and about the primary elements of the operations it carries out.

**Purpose and legal basis for the data processing.**

The collection and the processing of personal data, yours and, if necessary, that of your relatives, is carried out:

1. for your appointment, if this has not already happened;
2. for the calculation and the payment of your salary;
3. to fulfil what is described by current regulations on the subject of work safety and privacy;
4. for the fulfilment of legal and contractual obligations, including collective ones, connected to the employment relationship;
5. to execute any judiciary actions;
6. for the organisation of and the carrying out of training courses;
7. for requirements of an operational, managerial and accounting character.

Such information will be subject to processing which follows the principles of correctness, legality and transparency, in addition to protecting your confidentiality and rights.

In relation to the employment relationship, the Company may process data that the GDPR defines as “particular” in as much as it is suitable for ascertaining for illustrative purposes (but not exclusively):

- a) a general state of health (absences due to sickness, maternity, accidents), suitability or not for certain duties (this may be expressed by medical staff as a result of periodic examinations, either preventative or requested by yourself);
- b) trade union membership (assumed positions and/or requests for deductions for trade union membership fees), political opinions or the holding of an elected public office (permits or leave of absences), religious convictions (entitlement to religious holidays).

The data relating to state of health (that a doctor authorised whilst fulfilling duties described by Italian legislative decree 81/08 and by other provisions on the subject of health and safety in the workplace, as well as for the carrying out of preventative and periodical medical assessments) will be processed at the Company by the doctor him/herself exclusively. The doctor will communicate to the Company only their judgement regarding suitability/unsuitability with provisions or limitations.

Unless otherwise specified, the legal grounds for the processing of the data is art. 6 comma 1 letters a), b), c) and f) of EU regulation 2016/679 (GDPR).

#### **Mode of processing.**

The processing of data for the outlined purposes will be carried out by personnel identified in writing from amongst those to whom specific operational instructions have been provided. It will be carried out both in electronic (for example, electronic or magnetic storage) and non-electronic (for example, paper records) forms according to the privacy and safety rules laid out by legislation, regulations and internal provisions.

#### **Place of processing.**

The data is currently being processed and archived at the COMPAGNIA SIDERURGICA ITALIANA headquarters, Zona Industriale Rivoli - 33010 Osoppo (UD). The data could furthermore be processed on behalf of the undersigned by other companies in the Group, that is, companies and/or professionals (including external) according to the requirements necessary for the carrying out of the services entrusted to them.

#### **Conferring of the data.**

The conferring of data is obligatory for all as required by legal and/or contractual obligations and therefore, any refusal to supply it, or to its processing, will prevent COMPAGNIA SIDERURGICA ITALIANA from establishing an employment relationship, executing a contract or correctly carrying out all requirements connected to a contract, such as for example those of a salary, contributory, fiscal and insurance nature.

#### **Communication of the data.**

Without precluding communications and sharing of data carried out to fulfil legal obligations, your data may be communicated, in compliance with the legislation on the protection of personal data, to the following:

- Legal persons, both private and public, Agencies (INPS, INAIL, INL, Tax Authorities, etc.) and Associations including, for data on health, for the purpose of fulfilling requirements described by Italian legislative decree 81/08 as well as by other laws and regulations (including Regional and/or Local);
- Plans and Funds related to social security and welfare, including private and/or supplementary;
- Doctor's surgeries, in order to fulfil obligations related to health and safety in the workplace;
- Legal offices, audit firms and business organisations which the Company is a member of;
- Insurance companies, financial intermediaries and Credit Institutes;
- Trade union organisations to which a specific mandate has been conferred.

#### **Transfer of the data abroad.**

The data supplied may be transferred directly by COMPAGNIA SIDERURGICA ITALIANA to other companies in the Group, including ones with headquarters abroad, within the requirements outlined above.

In the case that one of the persons designated by the Company as responsible for data processing (pursuant to art. 28 GDPR) thinks it necessary by way of exception to communicate your data abroad, authorisation from COMPAGNIA SIDERURGICA ITALIANA will need to be requested, clearly stating the Country of destination and including a guarantee that they intend to adopt to render the transferal safe, respecting the rules set out by the Regulations on the subject and current national regulations.

**Audio-visual recordings.**

Your photographic image and/or any audio-visual recordings may be used, with your authorisation, for business promotion and training purposes. They may also be processed on optical and audio-visual media, that is - reproduced through films, brochures, posters, presentations and/or social network web pages, and on the internet sites of the Official in charge of data processing and other companies in the Group.

**Period of data storage.**

The supplied data may be processed for the entire duration of the employment and/or collaborative relationship as well as after the cessation of the relationship for the fulfilment of obligations connected to and deriving from its conclusion. In particular, in connection with the activities of administration, accounting, management, training of staff, contracts, employment law and the management of any litigation, there is in force a term of 10 years for storage, as described by art. 2220 of the Civil Code. This without prejudice to further periods of storage when they are set out by law.

**Rights of the Interested Party.**

The Interested Party, as set out by art. 15-22 GDPR, can exercise their right to access their personal data and its transferability. They can demand its updating, rectification or integration as well as, in the cases described by the current provisions, cancellation or limitation - that is, to oppose the processing. In the event in which the processing of personal data has been carried out in an illegitimate way, the Interested Party may lodge a complaint with a supervisory authority.

With the exception of the fulfilment of obligations described by current regulations at the time of revocation, the Interested Party can at any time revoke their consent to processing by COMPAGNIA SIDERURGICA ITALIANA by contacting the Delegate of the Official in charge of data processing on the subject of privacy.

**Official in charge of data processing.**

The Official in charge of data processing is COMPAGNIA SIDERURGICA ITALIANA S.r.l., with headquarters in Zona Industriale Rivoli - 33010 Osoppo (UD).

The person delegated for matters of privacy, who you will be able to contact for any clarifications and in order to exercise your rights as per art. 15-22 GDPR, is Dr. Dario Pascotto. Your outlined rights can also be exercised by sending a communication to the following email address [privacy@pittini.it](mailto:privacy@pittini.it) or to the fax number +39 0432 062812 or by telephoning +39 0432 062811.

Osoppo,

COMPAGNIA SIDERURGICA ITALIANA S.r.l.

Confirmation of receipt

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**CONSENT DECLARATION****(in accordance with art. 7, 13 and 14 of EU Regulations 2016/679)**

The Interested Party declares to have received the complete disclosure in accordance with art. 7, 13 and 14 of EU Regulations 2016/679, and expresses their consent to the processing of their personal data, including "particular" data, as well as to its communication, within the limits and for the purpose and duration specified in the disclosure.

 I consent I do not consent

Their photographic image and/or any audio-visual recordings may be used, with their authorisation, for business promotion and training purposes, as well as being processed on optical and audiovisual media, that is - reproduced through films, brochures, posters, presentations and/or social network web pages, and on the internet sites of the Official in charge of data processing and other companies in the Group.

All the authorisations granted by the undersigned can at any moment be definitively revoked via registered letter with notification of receipt or via email to the address [privacy@pittini.it](mailto:privacy@pittini.it) The revocation will have effect from the day following the day of receipt of the communication. This is without prejudice to the processing imposed by current legislation.

DATE	SURNAME AND FIRST NAME	SIGNATURE