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## PRIVACY POLICY FOR EMPLOYEES AND COLLABORATORS

pursuant to Art. 13 of EU Regulation 2016/679 of 27/04/2016

### 1. DATA CONTROLLER

**Resnova s.r.l.** with registered office in Brescia (BS), via Corsica 143, 25125, tax code and VAT number 03589640170, in person of its legal representative pro tempore, PEC: [resnova@messaggipec.it](mailto:resnova@messaggipec.it), e-mail: [info@piublue.it](mailto:info@piublue.it).

### 2. PURPOSES AND LEGAL BASIS OF PROCESSING

The personal data you provide in performance of the employment contract (legal basis for processing) will be processed exclusively for the following purposes:

- a) for eventual employment, where this has not already taken place;
- b) for the processing and payment of remuneration;
- c) for the fulfilment of legal and contractual obligations, including collective obligations, related to the employment relationship;
- d) in order to fulfil obligations arising from insurance contracts designed to cover risks related to the employer's liability for occupational health and safety and occupational diseases or for damage caused to third parties in the course of work or professional activity;
- e) to ensure equal opportunities in employment.
- f) to ensure the payment of family allowances, registration with social security/insurance institutions, management of leave (parental, adoption, foster care, for disabled family care, marriage), family deductions for dependents, processing of the single certificate, maternity management, paid leave ex L. 104/92, retained management.

The personal data you provide for the purposes under (b), (c), (d), (f) are also processed to fulfill a legal obligation under Art. 6(1)(c) GDPR.

In connection with the employment relationship, the Company may process, always for the above-mentioned purposes, data that the legislation defines as "special categories of personal data or so-called sensitive data", insofar as they are capable of detecting, for example:

- k) a general state of health (absence due to sickness, maternity, accident or compulsory start-up) suitability or unsuitability for certain duties (as expressed by medical personnel following preventive/periodic medical examinations or requested by yourself);
- l) membership of a trade union (taking office and/or requesting deductions for trade union membership dues), membership of a political party or holding elected public office (time off or leave of absence), religious convictions (religious holidays permitted by law).

Sensitive data, concerning the state of health, which are processed by the competent doctor, while performing the duties provided for by the provisions on health and safety in the workplace, in order to carry out preliminary and periodical medical examinations, shall be processed at the employer's premises exclusively by the same doctor as autonomous data controller under the obligation of confidentiality in accordance with the legislation in force. Only suitability judgments will be communicated by the doctor to the employer itself.

### 3. COMPULSORY OR OPTIONAL NATURE OF THE SUBMISSION OF DATA AND CONSEQUENCES OF A REFUSAL TO PROVIDE PERSONAL DATA

The provision of data is compulsory for all that is required by legal and contractual obligations, and therefore any refusal to provide such data in whole or in part may make it impossible for the Company to execute the contract or correctly carry out all the fulfilments, such as those of a retributive, contributive, fiscal and insurance nature, connected with the employment relationship.

### 4. DATA PROCESSING METHODS

The processing of personal data is carried out for the above-mentioned purposes, both on paper and on computer, by means of electronic or otherwise automated tools, in compliance with the regulations in force in particular on confidentiality and security and in accordance with the principles of fairness, lawfulness, transparency and protection of the Customer's rights.

The processing is carried out directly by the Controller's organisation, its Data Processors and/or Persons in charge of processing (authorized persons).

### 5. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PROCESSED DATA

Your personal data may be communicated, within the limits strictly pertinent to the above obligations, tasks and purposes and in compliance with the relevant legislation in force, to the following categories of subjects:

- m) Public bodies (e.g. INPS, INAIL, provincial labour directorate, tax offices);
- n) Professionals or service companies for business administration and management working on behalf of the Company;
- o) Pension and assistance funds, both private and corporate;
- p) Medical practices in compliance with occupational health and safety obligations;
- q) Insurance companies;
- r) Credit institutions;
- s) Trade unions specifically mandated by you;
- t) Supplementary funds;
- u) Tax assistance centres and employment agencies;

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Personal data will not be disseminated in any other way, except where required by law, regulation or EU legislation. The list of Data Processors is available at the Controller's premises.

## **5. DATA RETENTION**

In accordance with the provisions of Art. 13 para. 2, letter a) of the EU Regulation, all the aforementioned data and the other data constituting your employment status will be retained even after the termination of the employment relationship for the performance of all possible fulfilments connected with or resulting from the termination of the employment relationship itself arising from the fulfilment of specific obligations or to pursue specific tasks provided for by current national and European legislation, by collective agreements, including company agreements.

To this end, through periodic checks, the strict relevance, non-excessiveness and essentiality of the data shall be verified with regard to the relationship, service or assignment in progress, to be established or terminated, also with reference to the data that the person concerned provides on his or her own initiative.

Data that appear to be excessive or irrelevant after such checks may not be used except for the lawful retention of the act or document containing them.

The data will be kept for the period of time stipulated in the regulations on labour relations.

## **6. DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION**

Personal data are stored on servers located within the European Union. Data Controller does not intend to transfer Data to countries or organizations outside the European Union/EEA. In any case, Data Controller assures as of now that the possible future non-EU transfer of data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses approved by the European Commission pursuant to Art. 46 GDPR or to countries that the European Commission has deemed to guarantee an adequate level of protection, in accordance with the provisions of Art. 44 et seq. GDPR. Any exceptions to the above will take place only in compliance with Art. 49 GDPR.

## **7. POTENTIAL AUTOMATED PROCESSING**

No automated decision-making processes are used, including profiling activities as referred to in Art. 22 paragraphs 1 and 4 of the European Regulation 679/2016.

## **8. RIGHTS OF THE DATA SUBJECT**

The Data Subject may at any time exercise the rights reserved to him/her, as set out in Arts 15 et seq. of the EU Reg. In particular, the Data Subject has the right to request from the Data Controller access to and rectification or erasure of personal data concerning him/her or to object to the processing of personal data concerning him/her, as well as the right to data portability, to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of their being already recorded, and communication of such data in intelligible form. Where the processing is based on Art. 6, para. 1, letter a) or Art. 9, para. 2, letter a), the Data Subject has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

The Data Subject shall have the right to obtain: the updating, rectification or, when interested, integration of data; the erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed.

The Data Subject also has the right to object, in whole or in part: on legitimate grounds, to the processing of personal data concerning him/her, even if pertinent to the purpose of collection; to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

In compliance with Art. 15 letter f) of the aforementioned EU Regulation, the Data Subject has the right to lodge a complaint with the Data Protection Supervisory Authority.

In accordance with Art. 20 of the same EU Regulation, in the event of a request for data portability, the Data Controller will provide you with the requested data in a structured, commonly used and machine-readable format.

For the exercise of the rights referred to from art. 15 to art. 22 of the GDPR or for questions or information regarding the processing of your data and the security measures adopted, you can fill the request to our company to the following address:

**Resnova s.r.l.** with registered office in Brescia (BS), via Corsica 143, 25125, tax code and VAT number 03589640170, in person or its legal representative pro tempore, PEC: [resnova@messaggipec.it](mailto:resnova@messaggipec.it), e-mail: [info@piublue.it](mailto:info@piublue.it).

## **9. REGULATORY REFERENCES**

The full text of the EU Regulation and further relevant national data protection legislation can be found on the website of the Italian Supervisory Authority accessible at the following link [www.garanteprivacy.it](http://www.garanteprivacy.it).

## **10. CHANGES TO THIS DATA PROCESSING INFORMATION**

Should there be any substantial changes with regard to the way in which the data is processed, we will inform you of these changes immediately.