

COMPANY LETTERHEAD

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES

This is to inform you, pursuant to articles 12 and 13 of the EU Regulation n. 2016/679 on the "*Protection of natural persons with regard to the processing of personal data and on the free movement of such data*" (hereinafter Regulation), that, in the context of selection of candidates powered by **(insert company name)**, the company process a set of personal data concerning you, and, possibly, to your relatives.

1. Identity and contact details of the Data Controller

The Data Controller is **(insert company name)** with headquarter in **(insert company address)**.

2. Contact details of the DPO

Address: Corso d'Italia 35/b 00191 Rome – Phone number +39 06 845 611 fax +39 06 98968092e-mail address dpo@damicoship.com

3. Purposes of the processing

The processing of personal data by **(insert company name)** will be for the purpose of management of the selection activities.

In particular, the processing of personal data may be performed for:

- a. Acquisition of data in the screening phase of your application.
- b. Evaluation of your curriculum.
- c. Performing interviews.
- d. Reference checks.

4. Purposes in relation to special categories of personal data

In regards to special categories of data, when present within the curriculum and/or acquired during the selection activities (such as, for example, data concerning health, data revealing racial or ethnic origin or trade union membership, etc.), in accordance with the provisions of art.9 of the Regulation, they will be processed only if you give your explicit consent to the processing for the purposes related to the selection and pre-employment activities.

5. Legal basis of the processing

The legal basis of the processing is represented by the art.6, let. b):

b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and art.9 let. a) of the Regulation.

a) The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

6. Methods of processing

These data will be processed both by computerized and paper based methods, observing the rules on the protection of personal data, including those relating to data safety.

7. Categories of parties to whom personal data will be disclosed

The personal data you provide may be disclosed to public and private entities relevant to the purposes mentioned above.

The communication of personal data is carried out in accordance with the obligations provided by law. According to this, the personal data can be communicated to Employment Centres and to any other entity that may request it, always respecting the extent required by law.

Your personal data may also be provided to parties appointed by **(insert company name)**, as external data processors for the purposes strictly related to the execution and the management of the selection activities.

Finally, your data may be communicated to other companies of the d'Amico group based in the following non-EU countries: Singapore, Morocco, USA, Principality of Monaco, Liberia and Canada for requirements related to the management of your selection.

The transfer of your personal data is regulated and guaranteed by the "GROUP PRIVACY REGULATION" (containing the "Binding Corporate Rules" pursuant to EU REGULATION 679/2016)".

It is understood, moreover, the obligation of **(insert company name)** to release information to the Judicial Authority, whenever required.

8. Retention of personal data

The retention of your personal data will be carried out in compliance with security measures used by **(insert company name)** with regard to the protection of data, and the access to these data will be allowed only to subjects involved and designated for their processing.

In particular, your CV will be kept until the limitation period of the rights arising from the selection activities, and in any case for a period not exceeding two years. Once reach this deadline, your CV will be erased and you can proceed, if you wish, to send a new CV.

9. Rights of data subjects

You can exercise in every moment the rights of art. 13, letter b) and art. 15, 16, 17, 18 and 20 of the Regulation, addressing to DPO, at the contact provided in point n. 2 of this information.

In particular, as a data subject, you will require:

1. The access to the personal data concerning you, according with the art.15 of the Regulation.
2. The rectification of inaccurate personal data concerning you, according with the art.16 of the Regulation.
3. The erasure of personal data concerning you ("right to be forgotten"), according with the art.17 of the Regulation.
4. The restriction of processing of data concerning you, according with art.18 of the Regulation.

We inform you, finally, that you will have the right to object in every moment, according with the art.21 of the Regulation, if one of the situations described by the art.6, paragraph 1, letters e) and f) of the same Regulation occurs.

10. Consent and Withdrawal

You can withdraw your consent at any time by contacting the Data Protection Officer.

11. Complaint to the supervisor authority

With regard to art.77 of the Regulation, we remind you that you have the right to lodge a complaint to the supervisor authority if you think that the processing of your data is performed in violation of the provisions of the Regulation.

12. Nature of the processing and obligatoriness of personal data conferment

Many of the processed data are required to perform the obligations arising from legal requirements and to fulfil respective contractual obligations. In some cases, the lack of consent to the processing of personal data may make it impossible for **(insert company name)** to continue the working relationship established.

13. Existence of automated individual decision making in the processing

It is specified that, for the processing of the data, there is NOT any kind of automated individual decision-making, according with the art.22 of the Regulation.

14. Binding Corporate Rules

d'Amico Società di Navigazione S.p.A as Holding of d'Amico business Group, has formalized the Binding Corporate Rules (BCR) to provide the adequate guarantees required for the transfer of data within the Group to third countries for candidates. The Binding Corporate Rules are approved in absence of adequacy decisions deriving from Chapter V "Transfer of personal data to third countries or international organisation" of the Regulation.

BCR set the rules for the correct application of the policies about data protection and are legally binding for each company of the Group, including all group's employees.

BCR ensure the compliance with the data protection requirements and with the data subjects' rights, who are expressly conferred with rights related to the processing of personal data referred to them.

d'Amico Società di Navigazione S.p.A and its group undertakings have set up a privacy organisational system able to ensure the respect of data subjects' rights, as expected in Chapter III of the Regulation, called "Rights of data subject".

d'Amico Società di Navigazione S.p.A and its group undertakings provide information pursuant to Art. 13 of the Regulation, informing data subjects of the possible transfer of personal data concerning them to Group's controlled Companies, also outside the European Union and acquire their consent.

The information to be provided to data subjects contains all the elements provided for in the Regulation, including the rights of data subjects and the relating methods of operation.

In particular:

- right of access;
- right of rectification and erasure;
- right to restriction of processing;
- right to object.

These rights can be exercised by sending a request to the Data Protection Officer by e-mail.

It is specified that, pursuant to BCR, the interested parties have the rights to assert the BCR against any d'Amico Group Company which has violated the BCR, by filing a complaint with the competent Supervisory Authorities, including the right of the parties concerned to obtain compensation for the damage related to the failure to comply with the provisions of the rules not only against the data Controller, but also against the

external Data Processors or any sub-external Data Processors, if the direct recipient of the compensation request has disappeared or has legally ceased to exist.

d'Amico Società di Navigazione S.p.A has set up a complaint procedure by the data subjects that applies to all the companies of the group, which provides for the filing of a form to be sent to the attention of the DPO.

The fields of the form must be filled in in detail in order to allow the DPO to carry out the investigations necessary to assess the complaint and to propose any corrective actions to d'Amico Società di Navigazione S.p.A and its group undertakings.

The form is available on the web site <https://en.damicoship.com/privacy-cookies-policy/>

DECLARATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA

(Pursuant art. 7 and 9 of EU Regulation 2016/679)

Dear

((insert company name))

(insert company address)

Object: Consent to the processing of personal data

The undersigned _____, after having received the information under art. 12 and 13 of EU Regulation 2016/679 and aware of the rights established by art. 13, letter b) and by art. 15, 16, 17, 18 and 20 of the Regulation.

- Gives consent
- Denies consent

to the processing of personal data in the manner and for the purposes specified in the information to the extent that it is exploitable to the specific purpose pursued or to the provision of the requested services.

- Gives consent
- Denies consent

to the processing of special categories of personal data as reported at point 4. of the Information.

- Gives consent
- Denies consent

to the transfer of personal data within the d'Amico Group Companies even outside the EU, as specified in point 7 of the Information.

Date _____

Signature _____