

## RECRUITMENT PRIVACY STATEMENT STEFANINI EMEA

STEFANINI, with registered seats [here](#) (“STEFANINI”) respects your privacy and adhere to the EU General Data Protection Regulation, (EU) 2016/679 (“GDPR”).

This Privacy Statement is applicable to the Recruitment section of the STEFANINI website (<https://stefanini.com/en/careers/emea>) where you can find current job openings and career opportunities at STEFANINI and where you, the Candidate, can find the information to send your application via e-mail to ([RecruitmentEMEA@stefanini.com](mailto:RecruitmentEMEA@stefanini.com)) with a view on a potential employment at STEFANINI (“Recruitment”).

This Privacy Statement describes privacy practices of STEFANINI specifically for Recruitment in the collection, processing, use, storage, transfer, and disclosure of personal and personally identifiable Personal Data obtained from or about you both online and offline (“Personal Data”).

When you submit Personal Data to STEFANINI by sending your application to the recruitment e-mail via the website, you acknowledge that you have read and understood and agree to be bound by this Privacy Statement.

If you disagree with STEFANINI’s Privacy Statement, please do not transfer Personal Data to STEFANINI.

STEFANINI’s general corporate Privacy Statement and definitions used in this Privacy Statement for Recruitment can be found here: (<https://stefanini.com/en/stefanini/policies/privacy-policy>)

### NOTICE

STEFANINI collects, uses, and processes your Personal Data as legally permitted under Data Protection Laws.

“Data Protection Laws” means: all data protection laws applicable in the European Union applicable to the Processing of Personal Data under this Privacy Statement, including local, state, national and/or foreign laws, treaties, and/or regulations (“EU Data Protection Laws”) such as but not limited to the General Data Protection Regulation (EU) 2016/679 (“GDPR”), and implementations of EU Data Protection Laws into national law.

“Processing” or “Process” means any operation or set of operations performed on Personal Data or sets of Personal Data, such as collecting, recording, organizing, structuring, storing, adapting, or altering, retrieving, consulting, using, disclosing by transmission, disseminating or otherwise making available, aligning or combining, restricting, erasing or destroying

STEFANINI collects Personal Data about Candidates via web forms in case a Candidate visits the STEFANINI Career section of our website or via personal contact such as calls or electronic messages. STEFANINI only collects Personal Data which are adequate, relevant and not disproportionate for the Recruitment process with the exclusion of any sensitive Candidate Personal Data.

### Legal Basis

STEFANINI may process your Personal Data under the following legal bases:

- Consent – when you give your explicit consent on our website, for example when you file and send STEFANINI your candidature for a job opening.
- Compliance with a legal obligation – STEFANINI may be required by law to process the Personal Data for a legally defined purpose.
- Legitimate interests – STEFANINI may process Personal Data without your explicit consent if STEFANINI has a genuine and legitimate business reason unless this is outweighed by harm to your rights and interests. For Recruitment STEFANINI’s legitimate interests are the solicitation, evaluation, and selection of Candidates for employment and progress their application.

STEFANINI commits to use all Personal Data only in a fair and lawful manner, in accordance with applicable Data Protection Laws for both collection as processing.

Personal information submitted by a Candidate to STEFANINI will only be used by STEFANINI to support the recruitment process and for recruitment purposes only. Candidate Personal Data will not be sold to any third party.

Candidate Personal Data will be kept as accurate as possible and, as necessary in accordance with applicable laws.

### Personal Data that STEFANINI Collects

Personal Data that STEFANINI collects may include:

- your name, business title, contact details such as telephone, mobile, or fax, email and/or postal address when you communicate electronically, by telephone, or in writing with any STEFANINI employee or representative;
- additional information provided by application, such as a CV, resume, or transcripts; employment references and related information;
- interviewer or recruiter notes from their communications with you;
- compensation requests;
- your consent to STEFANINI’s processing of your Personal Data, if applicable;
- your consent to marketing permissions on the use of cookies and other data collection techniques, and

In addition, STEFANINI may collect information from third parties (for example but not limited to recruitment agencies, referrals, career platforms, professionally oriented social media, etc.), for example, in connection with a background or employment check and/or an employment reference, as far as possible and permitted under applicable law.

**Why STEFANINI Collects Personal Data**

STEFANINI uses the data it collects online or offline for the following purposes:

- (1) to recruit suitable personnel and collaborators to operate our business
- (2) to populate its Human Resources Software and manage all collected Candidate Personal Data in such Human Resources Software
- (3) to support or evaluate our recruitment process
- (4) process online applications for job vacancies and spontaneous job applications
- (5) to manage STEFANINI’s recruiting and hiring processes, and for compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and corporate management.
- (6) to send communications, including promotional communications regarding job opportunities, surveys or events

**Third party sub processors of Candidate Personal Data**

The table below shows the third-party processor that STEFANINI employs for Recruitment, with links to the respective Privacy Policies and Opt-out/Preferences Settings:

Name recruitment software	Privacy statement website	Processing operations	Place of storage	Place of processing	Opt-out/preferences settings
SmartSearch (Advanced Personnel Systems, Inc)	<a href="https://aps2k.com/privacy-policy/">https://aps2k.com/privacy-policy/</a>	<a href="https://aps2k.com/privacy-policy/">https://aps2k.com/privacy-policy/</a>	<a href="https://aps2k.com/privacy-policy/">https://aps2k.com/privacy-policy/</a>	<a href="https://aps2k.com/privacy-policy/">https://aps2k.com/privacy-policy/</a>	<a href="https://aps2k.com/privacy-policy/">https://aps2k.com/privacy-policy/</a>

**Collection, Use, and Processing of Candidate Personal Data**

STEFANINI may disclose certain Candidate Personal Data to a supplier, partner, or consultants to provide services which require the use and/or creation of Candidate Personal Data for the purposes described in this Privacy Statement and in accordance with applicable Data Protection Laws. In these limited instances, selected third parties may access Candidate Personal Data. All such third-party recipients will be bound to strict standards of security, confidentiality, and secrecy.

STEFANINI will disclose Candidate Personal Data in case this is required by law, by government authorities or in cases where it is obliged to do so to protect its rights in accordance with applicable laws.

Candidate Personal Data will be available to all STEFANINI recruiters of the STEFANINI Group globally (<https://stefanini.com/en/global>).

Candidate-Personal Data protected under GDPR will be retained for up to one year after completion of the recruitment process.

After the retention period the Candidate-Personal Data will be deleted.

To the extent not contrary to legal requirements or a legitimate interest of STEFANINI, STEFANINI will delete your Personal Data and your profile in the Human Resources Software, if applicable, as soon as you notify STEFANINI that you no longer wish STEFANINI to process your Personal Data. Please contact ([privacy@stefanini.com](mailto:privacy@stefanini.com)) with the appropriate request.

STEFANINI may disclose and transfer Personal Data to IT providers, subcontractors and other external service providers that assist in the operation of our website or the Human Resources Software, if any.

STEFANINI may disclose and transfer Personal Data to a third party in connection with a merger and acquisition or other similar activity.

**Storage, Transfer, and Disclosure of Personal Data**

STEFANINI hosts our website and the Human Resources Software on its servers or those of third parties ((sub)processors) globally. Your Personal Data collected offline or online may be stored and processed in a country where STEFANINI operates and may be shares with any company of the STEFANINI group globally (<https://stefanini.com/en/global>). By using our website or the Human Resources Software and/or providing Personal Data to STEFANINI, you consent to the transfer of Personal Data across STEFANINI’s subsidiaries in countries outside of your country of residence inside or outside of the European Union (EU) or European Economic Area (EEA), which includes other locations which may have different data protection rules than those of your country.

STEFANINI may share your Personal Data to other STEFANINI group companies if required for the purposes described in this Recruitment Privacy Statement. In order to provide adequate protection for the transfer of your Personal Data, where appropriate, we have in place contractual arrangements (such as the European Commission's Standard Contractual Clauses as appropriate) with our parent company, group companies and affiliates in respect of such transfers.

STEFANINI does not sell or allow your Personal Data to be used by third parties for their own (direct) marketing or other purposes. When STEFANINI discloses personal information for a business purpose, we enter into a contract with our contractual parties that describes the purpose and requires the recipient to both keep that Personal Data confidential and not use it for any purpose except performing the contract. When third parties are given access to Personal Data, in order to provide adequate protection for the transfer of your Personal Data, we have in place contractual arrangements including a data processing agreement and/or model contractual clauses as required in the applicable jurisdiction.

Candidate Personal Data protected under GDPR will be kept for a maximum of one year after the termination of the recruitment process. After the retention period the Candidate Personal Data will be deleted.

To the extent it is not contrary to any legal requirements or to a legitimate interest of STEFANINI, STEFANINI will delete your Personal Data and your profile in the Human Resources Software, as applicable, as soon as you inform STEFANINI that you do not wish STEFANINI to process your Personal Data any longer. Please contact ([privacy@stefanini.com](mailto:privacy@stefanini.com)) with the appropriate request.

STEFANINI may disclose and transfer Personal Data to IT providers, subcontractors, and other third-party service providers that assist with the operation of our website or the Human Resources Software.

STEFANINI may disclose and transfer Personal Data to a third party in relation to any merger and acquisition or other similar activities.

#### **Access, Correction, and Deletion of Personal Data**

You may request STEFANINI at ([privacy@stefanini.com](mailto:privacy@stefanini.com)) to modify, delete or restrict processing of your Personal Data. STEFANINI will make every reasonable effort to promptly comply with your request. STEFANINI may, however, limit access to your Personal Data where such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by international standards. To protect your privacy and the integrity of your Personal Data, STEFANINI may take reasonable steps to verify your identity before responding to your request, and to validate any request affecting your Personal Data when presented anonymously or when made upon an assumed name.

#### **Technical and Organizational Measures**

In order to secure the integrity, confidentiality and availability of Personal Data and to protect the stored Personal Data from illegal access, improper use, alteration, unlawful or accidental destruction and accidental loss, STEFANINI uses various technical, physical and organizational security measures and this following the newest technologies.

STEFANINI commits to implement at all times adequate security to protect manual and electronic processing of Personal Data and prevent its misuse, in accordance with applicable local legal requirements and contractually so that third parties and affiliates processing Personal Data observe security measures again in accordance with applicable local legal requirements.

#### **Rights of the Data Subject under the GDPR**

Candidates have various rights related to the processing of personal data. Candidates have (depending on the circumstances) the right to request access to the personal data (Article 15 GDPR), to rectification (Article 16 GDPR) or erasure (Article 17 GDPR), to restriction of processing (Article 18 GDPR), a right to object (Art. 21 GDPR) and a right to data portability (Art. 20 GDPR). If the processing is based on a consent, you can withdraw it at any time.

If you believe that the processing of your personal data is in violation of the GDPR, you have the right to complain to a supervisory authority.

Further information can be found in the STEFANINI Privacy Policy on the Website (<https://stefanini.com/en/stefanini/policies/privacy-policy>) under "Rights of the Data Subject".

#### **Data Protection Officer**

In accordance with GDPR regulations, STEFANINI has appointed a Data Protection Committee.

If you have any questions on STEFANINI's processing of your Personal Data or a request exercising your Data Subject's rights, please contact STEFANINI by sending an email to ([privacy@stefanini.com](mailto:privacy@stefanini.com))

We will respond to questions or concerns within 30 days.

#### **Complaints to a Data Protection Supervisory Authority**

If you believe that the processing of your Personal Data is in violation of the GDPR, you have the right to complain to the Supervisory Authority: the Belgian Data Protection Authority <https://www.dataprotectionauthority.be/>

#### **Revisions to this Privacy Statement**

STEFANINI may update this Privacy Statement from time to time to reflect changes to STEFANINI's Personal Data handling and protection practices or to comply with law and regulations. STEFANINI encourages you to review this Privacy Statement on a regular basis and whenever you elect to provide Personal Data to STEFANINI.

Candidates will always be able to locate the current version here or another corresponding, easily locatable point of our Website. If STEFANINI is intending to process your data for other purposes, i.e. those for which it was collected, it will notify Candidates about this in advance in compliance with the statutory provisions.

Candidates will be notified of material revisions to this Recruitment Privacy Statement electronically, or by other means that STEFANINI deems sufficient to reach your attention, such as a prominent post on our website or via the Human Resources Software.

Revised: May 2022