# **PRIVACY POLICY**



# What does this Privacy Policy apply to?

This Privacy Policy is understood as information notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("**GDPR**") and applies to the personal data relating to you collected and processed by Leaf Space S.p.A., with registered office at Via Giacomo Leopardi, no. 7, Milan (Italy) – in its quality of data controller – (hereinafter "**Leaf Space**", "**we**", "**us**" or "**our**", as appropriate) through the website www.leaf.space (the "**Website**").



# What personal data we collect?

We may collect the following categories of personal data:

- (1) identifying data such as name and surname;
- (2) contact details such as email address and phone number;
- (3) information on professional life such as data on education and previous work experience;
- (4) information related to your access to and use of the Website such as the IP address and approximate location of your device, the browser used, the operating system, the web page visited before accessing the Website, the pages visited and the time spent on those pages, the links clicked and other information, including information collected through cookies and other tracking tools;
- (5) any other information on your CV or otherwise voluntarily provided by you.

For more information about cookies, please see our <u>Cookie Policy</u>.

Provision of your personal data is voluntary but necessary for pursuing the purposes listed below; in the event you do not provide us your personal data, it will be impossible for us to pursue such purposes.



# How do we collect your personal data?

Most of the data we process are collected directly from you, when you browse the Website or fill in the forms that are present within it (like in the "*Careers*" section of the Website) and, in general, whenever you interact with us. We may also collect your data from third parties to which you have provided them.

We do not use any form of automated decision-making in connection with the processing of your personal data.



### For which purposes do we process your personal data?

We may process your personal data to:

- (1) answer to your questions and fulfil your information requests;
- (2) carry out the activities necessary or in any case related to the selection of personnel for the purposes of the possible conclusion of an employment contract with Leaf Space, both in relation to the position for which you apply and for any other open positions;
- (3) in the event that the selection process for which you applied is unsuccessful, allow us to store your CV in order to evaluate your

application in relation to any positions that may be opened in the future;

- (4) fulfil legal or regulatory obligations to which we are subject;
- (5) carry out, on an aggregate basis, statistical analyses on how you use the Website for merely internal purposes (statistical purposes);
- (6) exercise or defend legal claims;
- (7) carry out actions preparatory to or in connection with the execution of extraordinary transactions such as mergers, acquisitions and transfers of business units.

The processing of your personal data for the purposes under numbers (1) and (2) do not require your consent as it is necessary to comply with your requests, pursuant to Art. 6(1)(b) of the GDPR. The processing of your personal data for the purpose under number (3) requires your consent, pursuant to Art. 6(1)(a) of the GDPR. The processing of your personal data for the purpose under number (4) does not require your consent as it is necessary to fulfil the legal or regulatory obligations to which we are subject, pursuant to Art. 6(1)(c) of GDPR. The processing of your personal data for the purposes under numbers (5), (6) and (7) do not require your consent as it is necessary to pursue our legitimate interests, pursuant to Art. 6(1)(f) of GDPR.



#### How do we process your personal data?

We have security measures in place to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to the personal data.



# How long do we keep your personal data?

Your personal data will be stored for different periods of time depending on the purposes for which they have been collected. In particular:

- personal data collected for answering your questions and fulfilling your information requests will be kept until your request has been fulfilled;
- (2) with regard to personal data collected for purposes under numbers (2) and (3), if the selection process for the position which you applied to is successful, your personal data will be kept for the entire duration of the employment relationship and for 10 years after its termination; if, on the other hand, the selection process is unsuccessful, your personal data will be kept, subject to your consent, for 2 years from the end of the selection process; lastly, if you send us your CV voluntarily, we will keep it for 2 years from receipt;
- (3) with regard to personal data collected for statistical purposes, please refer to the <u>Cookie Policy</u>.

Data collected for the other purposes will be kept as long as it is necessary for pursue such purposes or as long as we are required to keep them in accordance with applicable laws and regulations.



#### With whom your personal data is shared?

Your personal data may be made accessible, brought to the attention of, or communicated to the following parties who will act as persons

authorised to the processing, data processors or autonomous data controllers:

- (1) our employees or collaborators in any capacity;
- (2) employees or collaborators in any capacity whatsoever of any parent, subsidiary or associated companies;
- (3) service providers and consultants (e.g. for the purpose of obtaining opinions on the correct application of employment law, with reference to the management of personnel recruitment and selection or for carrying out consultancy and/or assessment activities as part of the personnel selection process);
- (4) public authorities or bodies, if and to the extent that we are requested or required to do so by law.

You may request us at any time, by contacting us at the mail and e-mail addresses indicated below, the list with the names and contact details of the parties belonging to the above-mentioned categories of recipients.

As a rule, we do not transfer your personal data outside the European Economic Area (EEA). If any of the parties we use to process your personal data is established outside the EEA, we will transfer your personal data on the basis of the standard contractual clauses set approved by the European Commission by Commission Implementing Decision (EU) 2021/914 of 4 June 2021.



#### Your rights under the data protection law

- Pursuant to Articles from 15 to 21 of GDPR, you have the right to ask us to:
- be informed on the purposes and methods of the processing of your personal data;
- (2) access to and receive a copy of your personal data;
- (3) rectificate incomplete, inaccurate or out-of-date data;
- (4) delete your personal data;
- (5) restrict the processing of your personal data, where applicable under the GDPR;
- (6) object to the processing, wholly or partly, where applicable under the GDPR;
- (7) obtain the portability of your personal data, where applicable under the GDPR.

If consent is required for the processing of personal data, you may also withdraw the consent already given at any time, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

You may exercise any of the rights above and request any information on the processing of your personal data by contacting us by:

- mail at Via Giacomo Leopardi, no. 7, Milan 20123 (Mi);
- e-mail at <u>info@leaf.space</u>

In addition, you have the right to lodge a complaint with the Garante per la Protezione dei Dati Personali (<u>www.garanteprivacy.it</u>), if you believe that your rights under GDPR have been violated.

### Link to other websites

The Website may contain links to external websites. If you click on any of these links, you will be directed to a website not covered by this Privacy Policy.

### Changes to the Privacy Policy

We may review this Privacy Policy at our own discretion. Make sure to check the latest version available on the Website regularly.