

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
pursuant to art.13 of Regulation (EU) no. 2016/679**

Dear Sir/Madam,

EU Regulation 2016/679 on the “*on the protection of natural persons with regard to the processing of personal data and on the free movement of such data*” (“**EU Reg. 2016/679**” or “**GDPR**”) contains a series of direct rules to ensure that the processing of personal data is carried out in compliance with the fundamental rights and freedoms of individuals.

Pursuant to art. 13 of the GDPR, the following information is provided regarding the processing of personal data of the interested party.

We inform you that, by virtue of the employment relationship established with you, **Digital Bros S.p.A. Via Tortona, 37 - 20144 Milan (Italy)** collects, in its capacity as data controller (“Data Controller”), your personal data (“Data”).

1. Type of personal data and methods of collection

By personal data we mean all data which, at the time of establishing the employment or collaboration relationship and during the course of the same, the Data Controller has acquired and/or acquires in relation to your person and/or any members of the family nucleus of the latter, as communicated.

Common or generic data:

- or such as, for example, your personal details: name, surname, date of birth, tax code, residential address, contact details, bank details, e-mail address, etc. (“Data”);
- data relating to the employment relationship with the Company, such as management and updating data of the professional profile, assignment of new tasks, professional development;
- data necessary to control employee expenses (economic planning; preparation of budgets and their management; control of cost items relating to employees; management of travel expenses.

Particular categories of personal data (formerly known as “sensitive data”):

- i.e. data relating the state of health (absence due to illness, maternity, accident, suitability for certain jobs), membership of political parties (request for permits or leave for elective public offices), trade unions (taking trade union offices, request for deductions for trade union membership fees), associations or organizations of a religious nature (request for use, provided for by law, of religious holidays), philosophical, political, etc. (“**Special Data**”).

The processing of personal data will be based on principles of correctness, lawfulness, transparency and protection of the privacy and rights of the interested party.

2. Basis, purposes and methods of processing

2.1 The processing of your Data and Sensitive Data is based, depending on the case, on the existence of a contractual or legal obligation in any case deriving from and/or connected to the employment or collaboration relationship established.

2.2 Your Data and Sensitive Data will be processed, with the support of both paper and IT tools, guaranteeing in any case their relative security, logical and physical, and confidentiality, for the pursuit of the following purposes:

- (i) fulfillment of the obligations, of a legal and/or contractual nature, deriving from and/or connected with the correct execution of the existing employment relationship with you (i.e. contribution, salary and tax obligations and other obligations imposed by the law on the part of the employer, such as the protection of employees' health and safety);
- (ii) fulfillment of other obligations connected to the management of the employment or collaboration relationship, such as the recognition of trade union permits, the payment of deductions to trade union associations, etc.;
- (iii) fulfillment of other obligations established by laws, regulations and community legislation, as well as by the applicable C.C.N.L and by provisions issued by authorities legitimated by the law and by supervisory and control bodies;
- (iv) to assert or defend a right even by a third party in court, as well as in administrative or arbitration and conciliation procedures in the cases provided for by law, European Union legislation, regulations or national collective employment agreement, provided that the data are processed exclusively for these purposes and for the period strictly necessary for their pursuit;
- (v) to fulfill obligations deriving from insurance contracts aimed at covering the risks connected to the employer's liability in matters of hygiene and safety at work and occupational diseases or for damages caused to third parties in the exercise of the business or professional activity.

2.3 In any case, your Sensitive Data will be processed in compliance with the provisions of "Authorization no. 1/2016 - Authorization to process sensitive data within employment relationships" issued by the Data Protection Authority on December 15th, 2016. The data will be processed until the end of its validity and/or effectiveness and, subsequently, for the fulfillment of obligations and the exercise of the Data Controller's rights in the field of labor law, social security and social protection, in compliance with the applicable legislation on the matter and with the collective and individual contracts in place with you.

2.4 In addition to the above, the personal data of your family members, referred to in paragraph 1.1, acquired at the time of establishment of the employment relationship or during the course of the same, will be used for the purposes and within the limits strictly necessary for the execution of obligations deriving from the provisions of the law and from the C.C.N.L, applicable from time to time and, in general, from the existing contractual relationship with you, and, in particular, for any withholding taxes and tax deductions purposes, for the disbursement of checks to the family unit, for the management and assignment of paid leave pursuant to Law no. 104/1992 and other various types of leave (e.g. parental leave, for adoptions / foster care, family care of the disabled, marriage leave, mourning leave).

3. Mandatory or optional nature of personal data provision

3.1 The provision of Data is mandatory with reference to the purposes indicated in art. 2. Any refusal to provide them, in whole or in part, may make it impossible for the Data Controller to execute the employment relationship or collaboration or to correctly carry out all the obligations connected to the latter, such as, by way of example, those of a contributory, fiscal and insurance nature (processing of the pay slip, payment of social security contributions, payment of withholding taxes, payment of union deductions).

It should also be noted that the provision of data relating to one's family members is mandatory given that, in the event of requests for specific services (e.g. family allowances), any refusal could make it impossible to receive the relative economic treatment and/or allow the adoption of the measures relating to the requests presented.

3.2 Failure to provide Special Data could prevent the Data Controller from granting you certain benefits provided for by the Law or by the employment contract or could prevent the satisfaction of any legally justified requests (for example, anticipation of severance pay).

With reference to the above, you will in any case be asked at the bottom of this Information to consent to the processing of your Sensitive Data.

4. Communication

Without prejudice to the communications made in fulfillment of legal and contractual obligations, the common personal data and/or the Special Data may be communicated exclusively for the purposes indicated in art. 2 to the following subjects who will process them as independent data controllers:

- public bodies (INPS, INAIL, tax offices);
- social security and assistance funds, including private ones;
- medical offices in fulfillment of the obligations regarding occupational hygiene and safety and for the activities referred to in Legislative Decree no. 81/2008;
- insurance holder;
- credit institutions;
- supplementary funds;

Furthermore, the following categories may become aware of the Data and/or, depending on the case, also of the Special Data, as well as your family members the personal data within the limits and for the purposes referred to in paragraph 2.3 above:

- employees of the administration and of the HR departments, as persons in charge of the processing;
- the consultant in charge of payroll management and processing, as independent data controller;
- Italian or EU professionals or service providers, for business administration and management, (HR included) who operate on behalf of the Data Controller, as, depending on the case, as independent data controllers or data processors;

- public or private entities, including healthcare organizations, social security funds and supplementary healthcare assistance, including corporate healthcare, patronage and social assistance institutes, tax assistance centers, employment agencies, trade union associations and organizations.

A list of appointed data processors is available for consultation at the headquarters of the Data Controller.

In any case, the Data and Sensitive Data are not and will not be disseminated (meaning by this, the dissemination of personal data to indeterminate subjects, in any form, including by making them available or consultation), without prejudice to the hypotheses in which the diffusion is requested, in accordance with the Law, by police forces, judicial authorities, by information and security bodies or by other public entities for purposes of defense or state security or to prevent, ascertain or repress crimes.

5. Security of personal data

In any case, the personal data provided by the User will be treated in full compliance with the provisions of the Regulation and the Privacy Code. Suitable and preventive security measures will be adopted to safeguard the confidentiality, integrity, completeness and availability of the User's personal data. Pursuant to the provisions of art. 32 of the Regulation, "Security of processing", Part I, Title V, "Security of data and systems", Privacy Code and the related technical specification, adequate technical and organizational measures are developed to guarantee a level of security appropriate to the risk, through technical, logical and organizational measures to prevent any damage, loss, even accidental, alterations, improper and unauthorized use of the personal data processed.

6. Data retention

All Data will be kept by the Data Controller for the entire duration of the employment relationship and for the subsequent period within the maximum time established by the applicable legal provisions regarding the limitation of rights and/or forfeiture of action, in any case for a period of time not exceeding 10 years from the interruption of the employment relationship, without prejudice to the provisions on the retention times of data and documents by the law on administrative or tax matters.

7. Non-EU transfers

The personal data of the User are processed by the Data Controller within the territory of the European Union and are not disclosed.

If necessary, for technical or operational reasons, the Data Controller reserves the right to transfer the data of the User to countries outside the European Union. In this regard, the Data Controller ensures from now on that the transfer of data outside the EU will be regulated in compliance with the provisions of chapter V of the Regulation and authorized on the basis of specific decisions of the European Union. All the necessary precautions will therefore be taken in order to guarantee the total protection of personal data, basing this transfer: a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the recipient third party pursuant to art. 46 of the Regulation; c) on the adoption of binding corporate rules.

8. Rights

The User may request access to their data and have them integrated, updated or corrected and/or to exercise the other rights provided for by art. 15, 16, 17, 18, 19, 20 of the Regulation. Specifically:

Right of access

The User may request to obtain confirmation regarding the existence of a personal data processing and, if so, to access said data and specific information on the processing, such as, by way of example, the purposes, categories of data being processed, the existence of the other rights indicated below. User may also ask for a copy of your data.

Right to rectification

The User have the right to request and obtain rectification of personal data concerning them and/or the integration of incomplete personal data.

Right of cancellation

The User can obtain the cancellation of data, without unjustified delay, if (i) such data are no longer necessary for the purposes for which they were collected, (ii) the User has revoked the consent to the processing (unless another legal basis for such processing subsist), (iii) the User opposes the processing of their data (as indicated below), (iv) the data are being processed unlawfully, (v) the data must be canceled by virtue of a legal obligation, (v) the data belongs to a minor under 16 years of age in relation to the offer of information society services. Please note that this right does not apply if the data processing is necessary, *inter alia*:

- for the fulfillment of a legal obligation;
- for the assessment, exercise or defense of a right in court.

Right of limitation

The User has the right to obtain the limitation of the data processing in case of:

- dispute of the accuracy of personal data concerning them within the period necessary to verify the accuracy of these data;
- unlawful processing and request by the User to limit use instead of the relative cancellation;
- User necessity of the data for the assessment, exercise or defense of a right in court;
- opposition by the User to the processing, as indicated below, pending verification of the prevalence of legitimate reasons by the Data Controller.

Right to portability

The User has the right to receive the personal data concerning them in a structured, commonly used and automatically readable format and to transmit them to another data controller in relation to the cases in which the data

processing is based on consent or concerns particular categories of personal data processed on the basis of consent, or the treatment is based on the execution of a contract and this treatment is carried out with automated means. The User also has the right to obtain direct transmission of data from one Data Controller to another, where technically feasible. The possibility of obtaining the deletion of data, as indicated above, remains unaffected.

Right to object

The User has the right to object at any time to the processing based on a legitimate interest of the Data Controller, subject to the demonstration by the latter of compelling legitimate reasons for proceeding with the processing which prevail over the interests, fundamental rights and freedoms of the User or for the assessment, exercise or defense of a right in court.

The rights referred to in art. 15, 16, 17, 18, 19, 20, 21 of the Regulation, as well as in art. 7 of the Privacy Code, can be exercised by the User at any time by e-mailing the Data Controller.

The User may exercise their rights at any time at any time by writing to Digital Bros S.p.A. at Via Tortona 37/3B – 20144, Milan and by email at privacy@digitalbros.com or to the DPO at dpo@digitalbros.com.

In any case, you always have the right to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data - Piazza di Monte Citorio n. 121 00186 ROME, email: garante@gpdp.it), pursuant to art. 77 of the Regulation, should you believe that the processing of data is in violation of the legislation in force.

9. Data Protection Officer

The Data Controller has also appointed a Data Protection Officer (“DPO”), Veronica Devetag Chalaupka, pursuant to art. 37 of the GDPR. The DPO can be contacted for all matters relating to the processing of data and the exercise of the rights of data subjects, at the following address dpo@digitalbros.com or by sending a written communication to Via Tortona n.37/3B – 20144, Milan.

*

The undersigned, as identified below, declares to have received the information on the processing of personal data, and, with the signature to be aware of the purposes, legal basis, methods of processing their personal data.

_____, _____

[Place and date]

In the event that (sensitive) personal data relating to minors is collected, the signature affixed below must be that of the parent or of the person exercising parental responsibility for the minor. Similarly, in the case of an incapacitated person, the signature must be affixed by the person legally exercising parental authority or, in the absence, by a close relative, a family member or a cohabitant.

NAME	FAMILY RELATIONSHIP	SIGNATURE
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____