

Privacy notice on the protection of personal data

This privacy policy on the processing of personal data is provided in compliance with Article 13 of the EU Regulation No 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“**GDPR**”) in order to inform you in relation to the processing of your personal data through the website www.waysadvisory.it (the "**Website**"), owned by Ways Advisory S.p.A.

1. Who is the data controller?

The data controller is **WAYS ADVISORY S.P.A.**, with legal offices in Corso Italia, 13, 20122 Milan (Italy), Tax Code 12646650965, to be reached out at the following e-mail address info@waysadvisory.it (the "**Data Controller**" o the "**Company**").

2. Which kind of personal data are processed?

The Data Controller processes the following kind of personal data:

2.1 Web-surfing data

The servers and computer systems used to operate the Website acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. These data, although not collected to be associated with identified data subjects, might, by nature, allow users to be identified through processing and association with data held by third parties.

This category of personal data includes (i) the IP addresses of the devices used by users who connect to the Website; (ii) the addresses in URI (Uniform Resource Identifier) notation of the resources requested; (iii) the time of the request; (iv) the method used for submitting the request to the server, (v) the size of the file obtained in response; (vi) the numerical code indicating the status of the response given by the server (successful, error, etc.) and (vii) other parameters relating to the User's operating system and computer environment.

2.2 Cookies

Cookies are small text files that websites visited by users send to their terminals, where they are stored in order to be retransmitted to the same sites on subsequent visits.

Third-party cookies, instead, are set by a website other than the one the user is visiting. This is because on each site there may be elements (images, maps, sounds, specific links to web pages of other domains, etc.) that reside on servers other than that of the site visited.

Cookies are used for different purposes, have different characteristics, and can be used either by the owner of the site you are visiting or by third parties. Below you will find all the information about the cookies on this Website and the necessary instructions on how to manage your preferences regarding them.

More detailed information in relation to the cookies can be found in the “Help” section of the browser or on websites such as <http://www.allaboutcookies.org>.

For further information on the use of cookies through this Website, we invite you to read the cookie policy.

2.3 Data voluntarily provided

2.3.1 Data sent through the form available in the section “Contact us”

- General personal data: such as, by way of example, name, surname, residence address, e-mail, telephone/mobile number.

2.3.2 Data included in your *curriculum vitae*

Should you decide to send us your CV through the section “Work with us”, we inform you that the Data Controller might process the following category of personal data in the event they are actually included in your CV:

- General personal data: such as by way of example, (i) personal identification data, i.e. first name, surname, date of birth, as well as, if included in your CV, your picture; (ii) personal contact data, i.e. place of domicile or residence, telephone number and e-mail address; (iii) personal data concerning your education and any previous work experience, professional evaluation data such as professional skills, aptitudes, etc.); (iv) tax and accounting data such as tax regime and remuneration received, if applicable (necessary for the purpose of making a possible job offer and financial offer)
- Special categories of personal data: if included in your CV, the Data Controller may also process, by way of example, where applicable, data disclosing health status, racial or ethnic origin, data referred to in law No 104/92, political orientation, religious or philosophical beliefs, and trade union membership.

3. Which are the purposes of the processing and the related legal basis?

- Web-surfing data

Web-surfing data are processed for the purposes of enabling the user to use the Website and to learn about and be informed about the Company's business and services. These data, necessary for the proper functioning of the Website, are also processed for the purpose of:

- obtain statistical information on the use of the services (most visited pages, number of visitors by time slot or daily, geographical areas of origin, etc.);
- to control the correct functioning of the services themselves.

It is understood that no use is made of cookies while browsing the Website for the transmission of personal information.

The legal basis of the processing of your personal data consisting in the monitoring of the proper functioning of the Website is to be found in Article 6.1 letter f) of the GDPR, i.e. for the pursuit of the legitimate interest of the Data Controller.

Please note that such data could, in addition, be used by public security authorities to ascertain responsibility in the event of any computer crimes to the detriment of the Website.

- Data sent through the form available in the section “Contact us”

Personal data sent through this section are processed in order to follow up on user requests received by filling in the form, therefore, the legal basis for processing is to be found in Article 6.1, letter b) GDPR, as a pre-contractual measure is being implemented.

- **Data included in your *curriculum vitae***

The personal data provided to the Data Controller by sending your CV, are processed in order to execute the selection of personnel for open positions and/or positions that will be opened in the following 24 months from the submission of your application, therefore, to assess your suitability to fill the position for which you have applied; (ii) to notify you of the outcome of the selection.

For the pursuit of the aforementioned purposes, the legal basis for the processing of personal data is found in the following articles: Article 6.1(b) GDPR, insofar as it is necessary to execute a pre-contractual measure initiated by you with a view to the potential establishment of an employment relationship; as for special categories of personal data, the legal basis for the processing is to be found in Article 9.2(b) GDPR, insofar as it is necessary to fulfil obligations and exercise rights in the field of labor law and social security and social protection.

4. How long do we store your data?

- **Web-surfing data**

Such data will be stored for the period of time provided for by applicable laws and, in any case, for the time strictly necessary to provide the user with the requested service as well as to ensure the transmission of communication through the Website.

- **Data sent through the form available in the section "Contact us"**

The personal data sent via the form available on the Website will be kept for the time necessary to fulfil your request and for the duration of the relevant relationship.

- **Data included in your *curriculum vitae***

The personal data contained in your CV will be processed for the entire period during which the selection process takes place and, in any case, for 24 months from the end of the selection process, should you not be hired.

Should an employment relationship be established, your personal data will be processed for the entire duration of the employment relationship and, in any case, in accordance with the provisions set out in the specific information notice that will be provided to you when the employment relationship is established.

5. To whom will personal data be communicated?

Personal data voluntarily provided by you may be communicated to employees/collaborators of the Company, expressly and duly authorised to process the data, pursuant to Article 29 GDPR.

Personal data voluntarily provided by you are not transferred outside the EU. I dati personali da Lei volontariamente forniti non sono trasferiti al di fuori dell'UE.

6. Which is the nature of the provision of personal data?

- **Web-surfing data**

The provision of browsing data is automatic (therefore necessary) when you navigate on the Website. Furthermore, we invite you to read and take note of the Company's [Cookie Policy](#) for more information on how the Data Controller uses tracking technologies.

- **Data voluntarily provided**

The provision of personal data voluntarily provided is necessary in order to (i) follow up on requests sent via the form in the 'Contact Us' section; (ii) allow your participation in the recruitment process.

7. Which are your rights?

In compliance with Articles 15-22 GDPR, as data subject, you may exercise the following rights:

Access right: (i) the right to obtain from the data controller confirmation as to whether or not personal data are being processed and, if so, to obtain information on the origin, purposes, category of data processed, recipients of communication and/or transfer of data, etc.; and (ii) the right to obtain a copy of personal data, provided that this does not infringe the rights and freedoms of others.

Right of requesting correction: the right to obtain from the controller the correction of inaccurate personal data without undue delay, as well as the integration of incomplete personal data, also by providing a supplementary declaration.

Right to erasure: the right to obtain from the controller the erasure of personal data without undue delay in the event that

- the personal data are no longer necessary in relation to the purposes of the processing;
- the consent on which the processing is based is revoked and there is no other legal basis for the processing
- personal data have been processed unlawfully;
- personal data must be deleted in order to comply with a legal obligation.

Right to request the restriction of processing: right to obtain from the data controller the restriction of processing, in cases where the accuracy of personal data is contested (for the period necessary for the data controller to verify the accuracy of such personal data), if the processing is unlawful and/or you have exercised your right to object to the processing.

Right to data portability: the right to receive personal data from the controller in a structured, commonly used and machine-readable format and to transmit such data to another data controller, only where the processing is based on consent and only for data processed by electronic means.

Right to object to processing: the right to object at any time to the processing of personal data that have as their legal basis a legitimate interest of the controller.

The above rights may be exercised by contacting the Data Controller at the certified and ordinary email addresses indicated in paragraph 1 of this notice.

If you believe that the processing of your personal data is in breach of the provisions of the GDPR, you have the right to lodge a complaint with the Personal Data Protection Authority competent in your

country, as provided for in Articles 13 and 77 GDPR, as well as Article 140 *bis* of the Privacy Code, or to take legal action pursuant to Article 79 GDPR.

8. Validity of information

The Data Controller reserves the right to amend or simply update this privacy policy, in whole or in part, at any time.

We therefore invite you to visit this section regularly for the most up-to-date version. Use of the Site after the date of publication will imply deemed acceptance of the privacy policy. However, in the event of substantial changes to this privacy policy, the Data Controller will communicate these changes, as appropriate, by e-mail and, if necessary, request your consent again.

Last update: March 2023