

PRIVACY POLICY FOR PERSONAL DATA COLLECTED FROM THE DATA SUBJECT PURSUANT TO ARTICLE 13 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 (GDPR)

Last updated: January 2024

Fondazione Adecco ETS, with its registered office in Via Tolmezzo, 15 – 20132, Milan (MI) (the "Foundation", "Fondazione Adecco" or "we") is committed to protecting and respecting your privacy when filling out the contact form on its website (the "Website").

This "Privacy Policy" or "Policy" (together with the other documents referred to in this document) describes the categories of personal data we collect through this form as well as how we collect, use and process them.

Below there is a list of contents that, if you prefer, allows you to go directly to the relevant sections.

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Some clarifications

First of all, we need to be clear about the meaning of certain words in this Policy.

We are a private foundation created with the aim of making the world of work more inclusive. We offer education and work education courses to people with disadvantage, who have difficulty finding a job, providing them with the tools to achieve equal opportunities to access the world of work (our "**Activities**").

In order to carry out our Activities, we use multiple IT systems suitable to guarantee their security and confidentiality and with logics and methods strictly related to the purpose of facilitating integration into the labor market through individual or group education and work education.

Finally, this Policy regards data concerning you and does not concern data concerning the Foundation. This type of data is sometimes referred to as "Personal Data", "Personally Identifiable Information" or "PII". We use the term "**Personal Data**" in this Policy.

What are the sources of the personal data?

The Foundation collects your personal data directly from you, when you fill and send the contact form.

What personal data does the Foundation collect and use?

The personal data that the Foundation collects through the form include, but are not limited to:

- name, surname, personal contact details (such as e-mail address and telephone number), association/institution to which you belong;
- city from which you are contacting us;
- If you contact us, we sometimes keep a record of that correspondence;

Why and on what legal basis do we use your personal data?

The personal data provided will be processed for the following purposes:

1. reply to your requests or questions or provide you with information when you contact us or submit a request;
2. allow the registration of the data entered in the contact form and send you all the communications necessary for your possible involvement for the purposes indicated in the contact form, as well as carry out the operations in the event of possible accreditation to a project;
3. to carry out statistical and analytical studies and research for studies, statistical or impact analysis, preparation of qualitative-quantitative reports and communication of the Foundation's projects;
4. to transfer the data to third parties as better described in the paragraph below.

The law requires that there is a reason set out in the legislation itself for the processing of your data in our possession. The legal bases can be:

- Performance of a contract to which the data subject is a party or execution of pre-contractual measures: if you are a party to Foundation projects, the processing of personal data for all these purposes is based on processing grounds, such as the performance of a contract or execution of pre-contractual measures (purposes 1-2 above).
- Pursuit of our legitimate interest in compliance with the conditions of lawfulness pursuant to Article 6, lett. f) of EU Reg. 2016/679.

The processing is necessary in the legitimate interest of the Foundation for itself and its staff consisting in exercising the fundamental right to operate a business in a way that does not unduly prejudice its interests or fundamental rights and freedoms.

Do you have to provide us with the personal data we request?

You are not obliged to provide us with your personal data, but if you do not do so it will become impossible for us to involve you in our projects/activities.

You are not obligated to provide us with your personal information, but it would not be possible for us to work with you or provide you with our services, if you do not provide us with the minimum required. It may also limit the services you can receive from us if in some cases you choose to provide us with limited personal information.

How long do we keep your personal data?

Fondazione Adecco ETS

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The Foundation has the right to keep your personal data for the following maximum periods of time:

- in the event that you are not associated with any project: up to 72 months from the first meeting or from the last activity with which you show interest in us (for example, participation in an orientation moment, monitoring of the path, a call interview);
- in the event that you are associated with a project: up to 11 years from the termination of the individual project. Data is automatically destroyed by the system if not "moved". By "movement" we mean the inclusion of the person in another project or in training/inclusion paths.

Do we transfer your personal data to third parties?

We disclose your information to third parties in order to use it more efficiently and provide you with content, resources, and/or services. However, data is only shared in the following circumstances:

- **To suppliers.** For example, we will entrust a supplier with the performance of administrative and operational activities that are useful for the purposes of the relationship with you. The supplier(s) will be subject to contractual and other legal obligations regarding data confidentiality and respect for privacy and will only have access to the data they need to perform their functions; Generally, these are IT service providers (who host or support the Foundation's IT systems, including information about you), venue management companies (who are responsible for the physical security of buildings and therefore need to know your information in order to enable you to access the premises), and financial and accounting back-office service providers (who need to manage candidate information in order to process debit and credit positions).

We also use providers of technological and IT services and solutions.

- **To members of The Adecco Group and their affiliates (the "Members of The Adecco Group") inside or outside the European Union.** The list of countries in which we operate can be found at www.adeccogroup.com/worldwide-locations. The various reasons why data is shared with these entities are described below:
 - data is shared with The Adecco Group Members who provide IT functions for The Adecco Group companies worldwide. These IT functions are based in, among others, the Czech Republic and France;
 - data is also shared with The Adecco Group Members around the world (including legal entities acquired after the data was collected) for the purposes described above or to provide you with offers in line with your profile, if you have expressed an interest in local or international opportunities in that market or where The Adecco Group Members believe that you may have particular skills required or useful in that market.
- **To government authorities or law enforcement.** If, in our sole discretion, we believe that we are legally required or authorized to do so or that it would be prudent to do so, we will share your data with governmental, law enforcement and regulatory authorities or law enforcement agencies.

- **To potential sellers or buyers and their advisors.** As part of due diligence in connection with or executing a merger, acquisition, or other business transaction, we may need to disclose your information to the prospective seller or buyer and their advisors.

Do we transfer your data outside the European Union?

Your personal data may be transferred and processed in one or more countries, within or outside the European Union or Switzerland. The list of countries in which we operate is available at www.adeccogroup.com/worldwide-locations.

We may transfer data to parties set out in section above who are located outside the European Economic Area, the United Kingdom or Switzerland:

- to countries that the European Commission, the UK National Data Protection Authority or the Swiss Federal Data Protection and Information Commissioner consider to offer an adequate level of protection within the meaning of Art. 45 of the UK and EU GDPR or Art. 6 of the Swiss Federal Act on Data Protection (Art. 16 of the Revised Act) (a list of these countries can be found at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en) and to the address <https://www.edoeb.admin.ch/edoeb/it/home/protezione-dei-dati/handel-und-wirtschaft/uebermittlung-ins-ausland.html> (Switzerland), or;
- where Adecco Group has put in place appropriate safeguards to try to preserve the privacy of your data (in respect of which Adecco Group generally uses one of the forms of data transfer agreement approved by the European Commission, the UK National Data Protection Authority or the Swiss Federal Data Protection and Information Commissioner, copies of which are available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_it, <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/> and <https://www.edoeb.admin.ch/edoeb/it/home/protezione-dei-dati/handel-und-wirtschaft/uebermittlung-ins-ausland.html> (Switzerland). They are approved by the European Commission, the UK National Data Protection Authority or the Swiss Federal Data Protection and Information Commissioner pursuant to Art. 46 of the GDPR of the EU and the United Kingdom and Art. 6 of the Swiss Federal Act on Data Protection (Art. 16 of the Revised Act).

These countries include the Member States of the European Union, Switzerland, the United Kingdom and the United States.

By contacting us using the contact details below, you may request further information and obtain a copy of the relevant safeguards.

What data security measures do we take?

We are aware of the importance of protecting your personal data and have implemented appropriate operating procedures and technical-organizational security measures to prevent unauthorized access, modification, deletion or transmission of such data.

Although we do our best to protect your personal data, you should be aware that the transmission of information via the Internet is not completely secure and that we cannot guarantee the security of personal data transmitted to the Website or to third parties; For this reason, any transmission is at your own risk.

What are your rights?

In accordance with applicable data protection laws, you have the following rights:

- **Right to access and obtain a copy of your personal data**
You have the right to request confirmation from the Foundation as to whether your personal data is being processed. In that case, you will be able to access some of your personal data and certain information about how it is processed. In some cases, you may ask us to provide you with an electronic copy of your data. In certain limited circumstances, you will also have the right to request that we transfer ("portability") your personal data directly to another third-party provider.
- **Right to correct your personal data**
If you can prove that the personal data we hold about you is incorrect, you can request that we update or correct it.
- **Right to be forgotten or to erasure of personal data**
In certain circumstances you have the right to request the deletion of your personal data. Such a request may be made at any time and then will be up to the Company to determine whether it should be granted, without prejudice to the fact that this right is subject to any obligations relating to the retention of data to which we are required by law. If, in accordance with the law, it is determined that your request for erasure of your personal data should be granted, we will do so without undue delay.
- **Right to restrict the processing of your personal data or to object to it**
Under certain circumstances, you will have the right to obtain the restriction of the processing of your personal data or to object to certain purposes of processing on grounds related to your particular situation.

If the processing of your personal data by the Foundation is based on your consent, you have the right to withdraw it at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. In the event that you withdraw your consent, we may not be able to provide you with certain products or services. We will inform you of this at the time you withdraw your consent.

In the event that you wish to exercise any of your rights, you can use the appropriate form by clicking [here](#).

If the above link does not work, you can contact us at the email address diritti.privacy@adeccogroup.com.

Finally, you have the right to lodge a complaint with the data protection authority where you live or work or where you believe there is a problem in relation to your personal data.

How do we handle changes to this Policy?

The terms of this Privacy Policy may change from time to time. The Foundation will notify you of any material changes to this Privacy Policy by posting notices on its Website or by contacting you through other communication channels

How can you contact us?

In the event that:

- you have questions or concerns about this Privacy Policy;
- you would like to receive more information about how we protect your data (for example, when we transfer it outside of the country); or
- you want to contact The Adecco Group's Data Protection Officer (DPO) or your local privacy officer;

you can send an email to The Adecco Group's DPO at globalprivacy@adeccogroup.com to your local privacy officer at adecco.italyprivacy@adeccogroup.com.

If you would like to get in touch with the Head of the Foundation, please contact us by e-mail at fondazione.adecco@fondazioneadecco.it.