

INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR JOB APPLICATIONS

REV. OCTOBER 2024

With reference to the data communicated by sending your CV to the email address hr@aregroup.com as well as by completing the related forms on the pages of the website www.aregroup.com, in order to respond to potential open positions or for spontaneous applications, the following information is provided pursuant to and for the purposes of Article 13 of EU Regulation No. 2016/679 "General Data Protection Regulation" (hereinafter "GDPR").

Identity and contact details of the Data Controller:

Data Controller: ARE - Airlines Representative Europe S.R.L. C.F./VAT IT04105181004 Address: Via Napoli 15/19-00043, Ciampino (RM) Email: privacy@aregroup.com .

The company has appointed Attorney Adriana De Luca Bitonti as DPO, who can be contacted at gdpr@aregroup.com

1. Types of data collected and purpose of data processing

The data acquired by ARE through CVs (name, surname, place and date of birth, tax code, phone number, postal address, educational qualifications, and other personal identification elements), sent or acquired digitally and also through the completion of the form on our website pages, in relation to possible open positions or for spontaneous applications, fall within the category of "personal data" as per Article 4, paragraph 1 and paragraph 15 of the GDPR and will be processed exclusively for the purpose of:

- Potential employment.
- Processing documentation related to you (e.g., payroll).
- Fulfilling all obligations provided by the regulations in force regarding Workplace Safety, Privacy, and Environmental Protection.
- Compliance with legal and contractual obligations, including collective ones, related to the employment relationship.

Regarding the employment relationship, should an employment contract be established after the submission of the CV, the company may process data defined by law as "sensitive" as they are suitable for revealing, for example:

- General health status (absences due to illness, maternity (leave), injury, or mandatory placement), suitability or not for certain tasks (as result of preventive/periodic medical examinations carried out by medical personnel and/ or following the employee's requests);
- Union membership (holding positions and/or requesting deductions for union membership fees), membership of a political party or holding public elective offices (permits or leave), religious beliefs (religious holidays allowed by law).

Sensitive data concerning health status and physical fitness for work, in accordance with the obligations established by TUS (Legislative Decree 81/08) and other provisions regarding workplace hygiene and safety, for conducting preventive and periodic medical assessments, will be processed by the occupational doctor as an autonomous Data Controller, while the employer will only receive from the doctor the basic information needed for carrying out the task and the fitness status.

Only with your explicit consent may images concerning you be acquired and used for the company's commercial promotion, included in publications, magazines, newspapers, the website, or other digital communication media relevant to the activities, and will not be shared with third parties. Video and photographic images will be adequately stored at the company's premises. The use of the image is considered entirely free of charge. The use of the image in contexts that may damage personal dignity and decorum is prohibited.

The information on specific processing methods related to the employment relationship is also included in the hiring contracts.

2. Data processing methods, retention times, and the rights of the data subject

The processing of personal data will be carried out using computer systems in compliance with the requirements deriving from the GDPR and according to the criteria of lawfulness, fairness, and full protection of the rights and, in particular, the confidentiality of the respondents.

Candidates' data will be retained for 12 months on ARE's computer systems or, for a reasonably longer period consistent with workforce turnover needs, after which it will be automatically deleted, and no copies will be kept.

The data of hired workers will be retained for administration, accounting, payroll management, personnel training, contractual and labor law activities, management of any disputes, for 5 or 10 years as established by law under Article 2220 of the Civil Code, unless there are delayed payments or disputes justifying an extension.

The data subject retains the right to exercise the rights established by Articles 15, 16, 17, 18, and 20 of the GDPR (access, rectification, data deletion, restriction of processing, and data portability) during the above-mentioned retention period, as well as to lodge a complaint with a supervisory authority.

3. Data recipients

The data will be communicated within the company only to functions involved in the applications (corporate, commercial, and operational departments) and will not be communicated to affiliated and/or subsidiary companies, commercial partners, outsourcers for other commercial or marketing activities.

Common personal data may be communicated to the following categories of recipients:

- State administrations, Civil Aviation Regulators, Airport operators;
- Law enforcement authorities, Firefighters, Trade unions and associations;
- Social security funds, Insurance companies, Credit institutions;
- Medical and paramedical professionals;
- Accounting, tax, and Auditing Consulting firms, Payroll processing and Data processing Companies;
- Shareholders and/or partners;
- Companies for the performance of specific tasks (travel agencies, training centers, etc.);
- Airlines and suppliers of Airlines as clients of the Company..

The data will not be exported to third countries.

4. Consent to data processing

Having read the notice, pursuant to and for the purposes of Article 7 of the GDPR, by sending the CV and completing the related form, which will be transmitted to the appropriate company administrative functions, the data subject expresses consent to the processing by the Data Controller, ARE S.r.l., of their personal data for the purposes referred to in point 2. It is understood that in the event of refusal to consent to the processing, ARE will not be able to contact the data subject for recruitment activities and/or to proceed with the potential employment relationship.

5. Exercise of the data subject's rights

Pursuant to Articles 13, paragraph 2, letters (b) and (d), 15, 18, 19, and 21 of the GDPR, the data subject is informed that without restrictions and free of charge, they may:

- a) Request from the Data Controller access to personal data, rectification, deletion of the data, or restriction of processing concerning them¹, or object to their processing, as well as the possibility of obtaining the data in a structured format to allow data portability;
- b) Lodge a complaint with the Privacy Authority by following the procedures and instructions published on the official website of the Authority at www.garanteprivacy.it
- c) Any rectifications or deletions of processing upon the request of the data subject - unless this requires a disproportionate effort - will be communicated by the Data Controller to each of the recipients to whom the personal data has been transmitted. The Data Controller may inform the data subject of these recipients if the data subject so requests.

¹ It is possible to revoke consent to the processing of your personal data to the extent that such processing is based on consent and does not result in the termination of the existing contract to your detriment; otherwise, the related legal relationship would also cease