

Privacy Notice for Job Candidates

[Updated on 25.05.2018]

The Data Controller of the Job Candidates personal data is the relevant legal entity ("**Company**" or "**Controller**") to which the professional resume and or CV has been addressed to by email. Please refer to the company information as reported into the web page <http://www.boltongroup.net/en-ww/group/presence-in-the-world>.

The Company, which is part of the Bolton Group, provide to you this Job Candidates Privacy Notice (the "**Privacy Notice**") with the aim to explain the processing of job candidates' ("**Data Subjects**") Personal Data and special categories of personal data (the "**Personal Data**"), in the course of the recruitment process with the Company, in accordance with the letter of Applicable Data Protection Legislation (EU) no. 679 of April 27th, 2016, repealing Directive 95/46/EC and becoming effective as of 25 May 2018, and all the other applicable local data protection laws and Applicable Data Protection Legislations (the "**Applicable Data Protection Legislation**").

To that extent, we invite you to carefully read this document.

For any question relevant to the content of this Privacy Notice, you may write to the relevant email address [please go to the privacy contact list reported at the bottom of this notice].

1. How do we use your Personal Data?

The Company processes the Personal Data of Data Subjects for the following purposes:

- a) to manage the staff search and selection procedure, aimed at possibly establishing an employment or collaboration relationship, for itself or on behalf of third party companies.
- b) to fulfil obligations imposed by national and international Applicable Data Protection Legislations, also with regard to equal opportunities in employment;
- c) to protect the Company's rights, also judicially.

2. What Personal Data do we collect about You?

The Personal Data included in the *curriculum vitae* of the Data Subjects and, in particular, common data such as identity and contact details (for example, name, surname, email address, telephone number, etc.) are processed, to the extent strictly necessary to pursue the aforementioned purposes, along with data concerning the educational and professional experiences of the Data Subjects.

The provision of the Personal Data indicated in paragraph above is mandatory as - in its absence - the selection process may not take place.

For the **special categories of data indicated in Art. 9 of the Privacy Applicable Data Protection Legislation**, the Company will only collect data on any membership by the Data Subjects of protected categories pursuant to local law (which may be processed even without express consent from the Data Subject); therefore, Data Subjects must not include in their *curricula* additional data belonging to the aforementioned special categories ex art. 9 above mentioned (therein including data on health and political, religious and trade union opinions).

3. On what legal basis do we process your Personal Data?

The legal basis of processing of the Personal Data is constituted:

- a) by the Company's legitimate in managing the selection procedure;
- b) by the law or implementing measures of the competent public authorities on the Applicable Data Protection Legislation of the employment relationship.

4. Who can have access to your Personal Data?

The processed Personal Data may be communicated to entities designated by the Company as external processors in compliance with the provisions of the Applicable Data Protection Legislation.

The Personal Data of Data Subjects may also be communicated to other entities, autonomous processing controllers (therein including public bodies such as Chambers of Commerce, Tax Office, Regional Employment Directorate, Judicial Authority), if required by applicable rules of law.

5. Is your Personal Data transferred abroad?

The Company will not transfer the Personal Data in countries situated outside of the European Economic Area (EEA) to fulfill the purposes described in Section 1 of this Privacy Notice. On the contrary, the Company will adopt appropriate safeguards and legal tools for such transfer.

6. Retention period applying to your Personal Data

The personal data being processed are kept for a period of up to a maximum of 5 years, without prejudice to cases in which the preservation for a subsequent period is required for any disputes, requests by competent authorities or in accordance with the applicable legal provisions.

Within the end of the above mentioned retention period, the data will be erased.

7. What are your rights with regard to your Personal Data?

The Data Subjects, at any time and at no charge have and / or can exercise the following rights:

- a)** the right to be informed on the purposes and methods of the processing;
- b)** the right of access;
- c)** the right to obtain a copy of the Personal Data held abroad and obtain information concerning the place in which such data are kept;
- d)** the right to ask for updating, rectification or integration of the Personal Data;
- e)** the right to request the cancellation, anonymization or blocking of the Personal Data;
- f)** the right to restriction of the processing only where one of the following applies:
 - (i) the data are not accurate or updated;
 - (ii) the processing is proved unlawful;
 - (iii) the data are required for exercise or defense of legal claims; and
 - (iv) the data subject has objected to the processing;
- g)** the right to object to the processing, wholly or partly, also where it is carried out through automated individual decision-making, including profiling;
- h)** the right to receive an electronic copy of your Personal Data, if you would like to port your Personal Data to yourself or a different provider;
- i)** the right to lodge a complaint in front of the competent national data protection or judicial authority.

8. Updates to this Privacy Notice

The Company may change or update this Privacy Notice also following different interpretations, decisions, and opinions relating to the Applicable Data Protection Legislation, without prejudice to the application of any local labor, civil, criminal, administrative and / or regulatory requirement.

GDPR - Contact details

Company	Privacy Role	@ contact address
Bolton Group S.r.l	Privacy compliance officer	privacy@boltongroup.it
Bolton Group S.r.l	DPO	DPO@boltongroup.it
Bolton Alimentari S.p.A.	Privacy compliance officer	privacy@boltonalimentari.it
Bolton Manitoba S.p.A.	Privacy compliance officer	privacy@boltonmanitoba.it
L. Manetti - H. Roberts & C. p.A.	Privacy compliance officer	privacy@manettiroberts.it
Collistar S.p.A.	Privacy compliance officer	privacy@collistar.it
Saupiquet Sas	Privacy compliance officer	privacy@Saupiquet.com
Bolton Solitaire Sas	Privacy compliance officer	privacy@boltonsolitaire.fr
Rogé Cavaillès Sas	Privacy compliance officer	privacy@rogecavailles.fr
Bolton International S.r.l.	Privacy compliance officer	privacy@boltoninternational.it
Bolton Hellas SA	Privacy compliance officer	privacy@boltonhellas.boltongroup.gr
Bolton Cile Espana	Privacy compliance officer	privacy@boltoncile.es
Saupiquet Deutschland GmbH	Privacy compliance officer	privacy@saupiquet.de
Bolton Belgium S.A.	Privacy compliance officer	privacy@boltonbelgium.boltongroup.be
Bolton Nederland B.V.	Privacy compliance officer	privacy@boltonnederland.nl
Bolton Austria GmbH	Privacy compliance officer	privacy@boltonaustria.at
Bolton Polska Spzoo	Privacy compliance officer	privacy@boltonpolska.pl
Bolton Czechia spol s.r.o.	Privacy compliance officer	privacy@boltonczechia.cz
Bolton Swiss S.A.	Privacy compliance officer	privacy@boltonswiss.ch
Bolton Croatia d.o.o	Privacy compliance officer	privacy@boltoncroatia.hr
Bolton Adriatic d.o.o.	Privacy compliance officer	privacy@boltonadriatic.si
Collistar Nederland B.V.	Privacy compliance officer	privacy@collistar.boltongroup.nl
Bolton Group B.V.	Privacy compliance officer	privacy@boltongroup.nl
Bolton Adhesives B.V.	Privacy compliance officer	privacy-Adhesives@boltonadhesives.com
Bison International B.V.	Privacy compliance officer	privacy-Bison-International@boltonadhesives.com
UHU Holding GmbH	Privacy compliance officer	privacy-UHU@boltonadhesives.com
UHU Bostik S.p.A.	Privacy compliance officer	privacy-UHU-Bostik@boltonadhesives.com
Perfecta Chemie International BV	Privacy compliance officer	privacy-Perfecta@boltonadhesives.com
UHU Austria Ges.mb.H.	Privacy compliance officer	privacy-UHU-Austria@boltonadhesives.com
Productos Imedio S.A.	Privacy compliance officer	privacy-Imedio@boltonadhesives.com
UHU-Bison Hellas	Privacy compliance officer	privacy-UHU-Hellas@boltonadhesives.com
UHU France S.à.r.l.	Privacy compliance officer	privacy-UHU-France@uhu.boltongroup.de
UHU Ibérica Adesivos	Privacy compliance officer	privacy-UHU-Iberica@boltonadhesives.com
Griffon France S.à.r.l.	Privacy compliance officer	privacy-Griffon-France@boltonadhesives.com
Grupo Conservas Garavilla S.L.	Privacy compliance officer	privacy@isabel.net
Conservas Selectas de Galicia S.L.U.	Privacy compliance officer	privacy@isabel.net
Bolton Romania	Privacy compliance officer	privacy@boltonbgromania.ro