

**Subject Matter: Privacy policy, in accordance with article 13, EU Regulation 679/2016 – “GENERAL DATA PROTECTION REGULATION” (hereinafter “GDPR”) – and Legislative Decree 196/2003, integrated by Legislative Decree 101/2018.**

This is to inform you of how EUROTEC S.r.l. (hereinafter also the “Company”) processes the personal data you provided as Employee of the Company. This privacy policy is also available on our websites: [www.elettrobar.it](http://www.elettrobar.it) , [www.colged.it](http://www.colged.it) , [www.colged.de](http://www.colged.de) , [www.colges.es](http://www.colges.es) .

Unless otherwise provided, all mentioned articles refer to the policy identified in the title.

### **1) Data Controller**

The Data Controller is Eurotec S.r.l., with headquarters in Viale Europa 24, San Pietro di Legnago (37045 - VE, Italy), VAT n. IT12073160157, in the person of its legal representative, Roberto Guizzardi. This privacy policy applies explicitly to the Washing Divisions.

### **2) Designation of the Data Protection Officer**

A Data Protection Officer was not appointed, as the provisions in article 37 of the GDPR and in the various interpretations of the Data Protection Authority do not apply to the Data Controller.

### **3) Data Subject to Processing**

Processing activities involve personal data:

- 1) EMPLOYMENT MANAGEMENT - any personal, identification and contact details (for example, name, surname, tax ID, address, telephone number, email address, ID document number), security data and bank details (information strictly necessary to pay salaries), hereinafter “personal data”, you provided when your employment with our Company started. Personal data also include basic health information (in relation to the ability to work) and information in connection with prescriptions or being part of protected categories.
- 2) CONTACT - direct contact details, to ensure availability.
- 3) INAIL AND INJURIES - potentially sensitive data, regarding your health conditions and history in connection with your employment with the Company.
- 4) EMPLOYEE ASSESSMENT AND BONUS - data connected with your performance. The Company may collect data pertaining to attendance/absence, productivity, hard/soft skill performance, to assess the opportunity to award bonuses, or manage your position within the Company.
- 5) FUNDED ACTIVITIES - personal identification and contact details sent to entities in charge of managing funds for training activities.
- 6) EXPENSE NOTES - data pertaining to expenses and items consumed during work carried out for the Company.

### **4) Data Provision, Purpose and Legal Basis of Data Processing**

Data described in point 3.1 and 3.6 are processed to manage the relationship between you and the Company. The legal basis is the correct execution of the contractual relationship. Lawfulness is based on article 6, paragraph 1), letter b), and article 9, paragraph 2), letters b) and h). Data provision is mandatory and not subject to consent. Failure to provide this data will result in the impossibility to enter the Company.

Data described in point 3.2 are processed to meet the Company’s need to optimise production organization, including managing work shifts. Lawfulness is based on article 6, paragraph 1), letter f). Data provision is mandatory.

Data described in point 3.3 are processed both to comply with a legal obligation and to protect your health and ensure your physical safety and security. Lawfulness is based on article 9, paragraph 2), letters c) and h). Data provision is mandatory.

Data described in point 3.4 are processed to correctly award you any performance-based bonuses or to optimize your role in relation to your actual participation in the company's activities (in terms of quantity and quality). Lawfulness, subject to your explicit consent, is based on article 6, paragraph 1), letter a). Data provision is optional. Failure to consent to the processing of this data does not affect your relationship with the Company, however it prevents it from being able to award you any performance-based bonuses or other rewards.

Data described in point 3.5 are processed to allow the Company to obtain public and/or private funding to arrange for your training activities. Lawfulness, subject to your explicit consent, is based on article 6, para-

graph 1), letter a). Data provision is optional. Failure to consent to the processing of this data does not affect your relationship with the Company, however it prevents it from being able to obtain funding to arrange for your training activities.

## **5) Processing Methods and Duration**

Your personal data are processed by carrying out the operations described in article 4, n. 2) of the GDPR and in particular: collecting, recording, organizing, conserving, consulting, using, blocking, communicating, erasing and destroying. Your data are processed on paper and electronic and/or automated format.

All the data you provide for fiscal/administrative purposes will be stored in our database for 10 years, as provided by the applicable legislation. Unless otherwise provided, all the data you provide for non-fiscal purposes will be stored until the end of the contract based on which they were provided.

## **6) Data Access**

Your data may be accessed for the purposes described in point 4) by the Data Controller's employees and collaborators, in their capacity as internal data processors and/or system administrators, or by third-party companies or other subjects outsourced by the Data Controller (including but not limited to credit institutions, private firms, consultants, insurance companies for the provision of insurance services, etc.), in their capacity as external data processors.

## **7) Data Communication**

Without your expressed consent – as provided by article 6, paragraph 1), letters b) and c), and article 9, paragraph 2, letter e) of the GDPR – the Data Controller may communicate your data for the purposes described in point 4) to supervision organs, judicial authorities, insurance companies for the provision of insurance services, and to subjects to whom communication is necessary for the purposes therein. These subjects will process the data as autonomous data controllers. Your data will not be diffused.

## **8) Data Transfer to Non-EU Countries**

Personal data, as described in point 3), are retained in electronic and/or paper format on servers and/or archives located at the Data Controller's headquarters, within the European Union. However, the Data Controller will have the right, if necessary, to move the archives and servers to other EU or non-EU countries, for example if it makes use of Cloud services or if data has to be transferred to the parent company ITW, in Glenview, Illinois, in the United States. In any case, the Data Controller assures that any data transfer to non-EU countries will be subject to all applicable laws and the standard contractual clauses established by the European Commission.

## **9) Data Subject Rights**

As data subject, you have the rights set by articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right to access
- Right to rectify
- Right to erase (right to be forgotten)
- Right to limit processing purposes
- Right to the requirement of notification if your data are rectified or deleted or the processing purposes limited
- Data portability right
- Right to object to data processing
- Rights pertaining to the automated processing of personal data, including profiling

## **10) Methods to Exercise Data Subject Rights**

At any time, you may exercise your rights by sending:

- a letter by recorded mail to the Data Controller, at the address in point 1)
- an email to [privacy@elettrobar.it](mailto:privacy@elettrobar.it) or [privacy@colged.it](mailto:privacy@colged.it)

**EUROTEC S.r.l.**

I, the undersigned,

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Employee of Eurotec S.r.l., declare that I have read the privacy policy drafted in compliance with Regulation EU 679/2016 and Legislative Decree 196/2003, integrated by Legislative Decree 101/2018.

San Pietro di Legnago (VR), Italy, on \_\_\_\_\_

Furthermore, I

1)

CONSENT

DO NOT CONSENT

To the processing of the data described in point 3.4 of the privacy policy, for the purposes set in point 4 (collection and use of performance and/or assessment data)

2)

CONSENT

DO NOT CONSENT

To the processing of the data described in point 3.5 of the privacy policy, for the purposes set in point 4 (use of personal data for the provision of funded training activities)

San Pietro di Legnago (VR), Italy, on \_\_\_\_\_