



PRIVACY POLICY PURSUANT TO ART. 13 OF THE REGULATION (EU) 2016/679

for applicants

'Controller',

Pursuant to art. 4 of the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as 'EU Regulation'), T.C.R. S.p.A., with registered office in Via Classicana 105, 48122 Ravenna (RA), Italy, shall be the Data Controller and, pursuant to art. 13 of the EU Regulation ('Information to be provided where personal data are collected from the data subject'), provides the information below.

T.C.R. S.p.A. informs you that your personal data collected, also in relation to your application for employment in our organization (for example, without limitation, as employee/collaborator/intern/etc.), shall be processed in compliance with the above-mentioned regulation. In relation to such processing, the Controller provides herewith the additional information below.

'Personal data' (pursuant to art. 4, no. 1, of the Regulation (EU) 2016/679) means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

'Processing' (pursuant to art. 4, no. 2, of the Regulation (EU) 2016/679) means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Your personal data shall be processed according to the principles of fairness, lawfulness and transparency, thereby protecting your privacy and rights.

T.C.R. S.p.A.

(Company subject to the management and coordination by Porto Intermodale Ravenna S.p.A. -

S.A.P.I.R.)

Via Classicana 105, 48122 Ravenna, Italy - Tel. +39 0544 434411 - Fax +39 0544 434239

segreteria@tcravenna.it - www.tcravenna.com - Share capital Euro 1,040,000

Tax code, VAT registration number and number of registration in the Companies' Register Ra





Personal data collected

The personal data collected consist mainly of:

- Identification data (name and surname, location's address, telephone, fax, email, tax data, etc.);
- Data relating to the judicial relationships to be established (for example, without limitation, employment as employee, independent professional, intern, etc.). Such data are provided directly by the data subject (in the broadest sense of the term).
- 'Special' data relating to general health status (for example, if the data subject has a legally protected status), political opinions, religious or philosophical beliefs, trade union membership.

Identity and contact details of the Controller

Business name: T.C.R. S.p.A.

Registered office's address: Via Classicana 105, 48122 Ravenna (RA), Italy

Telephone contact details: +39 0544 434444

Email contact details: segreteria@tcravenna.it.

Contact details of the Data Protection Officer (DPO)

Registered office's address: dataprotectionofficer@tcravenna.it.

Purposes of the processing

Personal data are processed for the following purposes:

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- Work management, planning and organization (CV management, search according to educational qualifications or job);
- Management of applications assessment, recruitment, and personnel selection.
- Sending of informative materials on the company's services;
- Organization of meetings for exchange of information;
- Sending of SMS messages or emails to select applicants or inform about any job opportunities; carrying out of communication and promotional activities also via SMS messages or emails.

Categories of recipients

In relation to the above purposes, collected data may be shared with any companies employed by TCR Spa for personnel selection, which, by entering into specific internal contracts, shall be authorized to use all the data collected by the Controller to carry out their specific applicant selection activities in compliance with applicable laws and regulations.

Therefore, the personnel of such companies shall be formally responsible for data processing.

Processing methods

Personal data shall be processed in paper, electronic or telematic form and stored in appropriate databases (applicants as collaborators or interns, etc.) which could be accessed by any persons expressly appointed by the Controller as Processors and Persons in charge of data processing, who will be able to consult, use, process and compare data as well as carry out any other operation, including any automated operation, on such data in compliance with the relevant laws and regulations to ensure the confidentiality and safety of data as well as the accuracy, update and relevance of data with respect to the above purposes of processing. Such data may be collected from the data subject as well as from third parties or public lists.

Provision of personal data

The provision of the personal data requested is not mandatory. However, in the event of failure to provide such data, the Controller shall not be able to perform the checks provided for by current internal procedures and thus carry out the necessary activities for personnel selection.

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Storage period

Your personal data shall be stored for up to 5 years from the receipt of your CV or from the date of last update of your CV sent to us.

Transfer of personal data to third non-EU countries

TCR Spa shall not transfer any personal data to non-EU countries.

Automated decision-making

The Controller shall not use any automated decision-making process.

Rights of the data subject

In relation to the personal data under this [privacy policy](#), the data subject may exercise the following rights under the EU Regulation:

- right of access by the data subject [art. 15 of the EU Regulation] (right to be informed on the processing carried out on his or her personal data and to receive a copy thereof);
- right to rectification of his or her personal data [art. 16 of the EU Regulation] (the data subject shall have the right to obtain the rectification of inaccurate personal data concerning him or her);
- right to erasure of his or her personal data without undue delay ('right to be forgotten') [art. 17 of the EU Regulation] (the data subject shall have, now and in the future, the right to erasure of his or her personal data);
- right to restriction of processing of his or her personal data in the cases under art. 18 of the EU Regulation, including unlawful processing or accuracy of the personal data contested by the data subject [art. 18 of the EU Regulation];
- right to data portability [art. 20 of the EU Regulation], the data subject shall have the right to receive his or her personal data in a structured format in order to transmit those data to another controller in the cases provided for in that same article;
- right to object to the processing of his or her personal data [art. 21 of the EU Regulation] (the data subject shall have, now and in the future, the right to object to the processing of his or her personal data);

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- right not to be subject to automated decision-making [art. 22 of the EU Regulation] (the data subject shall have, now and in the future, the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject is available on the company's website or may be obtained by requesting to the Controller the full text of the above-mentioned articles.

— The above rights may be exercised in compliance with the EU Regulation by sending an email to privacy@tcravenna.it.

Pursuant to art. 19 of the EU Regulation, if possible, T.C.R. S.p.A. shall communicate any rectification or erasure of personal data or restriction of processing required to the recipients to whom the personal data have been disclosed.

If the legal basis of T.C.R. S.p.A.'s purpose of the processing is the data subject's consent, the data subject shall have the right to withdraw his or her consent at any time by sending an email to privacy@tcravenna.it.

Pursuant to art. 7 of the EU Regulation, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Right to lodge a complaint

If the data subject deems that his or her rights have been compromised, the data subject shall have the right to lodge a complaint with the Italian Data Protection Supervisor according to the procedure specified by the Italian Data Protection Supervisor at the following website

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>.

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