

## **Privacy Notice for Job Applicants**

(Pursuant to Articles 13 and 14 of the EU General Data Protection Regulation – Regulation (EU) 2016/679 – “GDPR”)

Personal data refers to information relating to an individual that allows for their identification among other individuals. Examples of personal data include name and surname, identity card or passport number, health-related information such as illness or injury, and information concerning criminal offences and convictions.

### **Data Controller**

Generali Employee Benefits Business Service Center S.R.L., with registered office at Via del Mulino, 4 – 20057 Assago (MI) (hereinafter, the “Company” or the “Controller”), will process your personal data for the purpose of recruitment and selection as an independent data controller.

If you require further information or wish to exercise your rights under applicable data protection laws, you may contact the Data Protection Officer at Generali Employee Benefits Business Service Center S.R.L., Via del Mulino, 4 – 20057 Assago (MI), or via email at [privacy@geb.com](mailto:privacy@geb.com).

### **Purposes and Legal Bases for Processing**

- The Company collects the personal data you have provided in your Curriculum Vitae (CV) or communicated, for example, during interviews, video interviews, or assessments, or obtained from third parties such as recruitment agencies, professional social networks (e.g., LinkedIn), or Generali Group companies; this typically includes identification data, such as your name, surname, address and contact details, educational and professional background, professional skills, and photograph.
- The Company uses your personal data, including, where necessary, data relating to your health (such as, for example, disability status for protected categories)<sup>1</sup> or data relating to criminal offences and convictions (where the collection of such certification is required by law), for the purposes of recruitment and selection of personnel:
  - a) to assess your profile and professional skills; your general personal data are processed for the purpose of taking pre-contractual steps; your health data, where necessary, are processed to comply with obligations or to exercise specific rights of the Controller or your own; in our activities, we never use fully automated processes, and human intervention is always involved;
  - b) to consider you for any future professional opportunities in line with your profile: your data are processed based on the legitimate interest of the Company and third parties
  - c) to prevent and detect fraud, take legal action, report potential offences to the Authorities, carry out intra-group communications, and protect the security of buildings and IT systems: your data are processed based on the legitimate interest of the Company and third parties;
  - d) to carry out activities required by law, such as complying with obligations or duties under national and EU labour legislation, and in relation to checks required for the prevention of organised crime and money laundering, fulfilling the Company’s accounting obligations, and responding to requests from authorities, such as the Carabinieri.

<sup>1</sup> in accordance with Article 9(2)(b) of the GDPR

## How the Controller Uses Your Personal Data and to Whom It Is Disclosed

The Company, through its employees, collaborators, and also external parties<sup>2</sup> (including companies), uses the personal data it has obtained from you or from other sources (such as Generali Group companies, recruitment and selection agencies, or professional social networks, e.g., LinkedIn), both in paper form and, predominantly, through electronic means.

For the purposes of recruitment and selection, the Company may disclose your personal data, where necessary, to private and public entities that perform technical, organisational, or operational tasks<sup>3</sup>.

Based on the activities it is required to perform, the Company may process your personal data both in Italy and abroad, and may also disclose such data to entities located in countries outside the European Union that may not guarantee an adequate level of data protection according to the European Commission. In such cases, the transfer of your personal data to entities outside the European Union will take place with appropriate and adequate safeguards in accordance with applicable law. You have the right to obtain information and, where appropriate, a copy of the safeguards adopted for the transfer of your personal data outside the European Union by contacting the Data Protection Officer. The Company will not make your personal data publicly accessible

## How Long Your Personal Data Are Processed

The Company retains your personal data for as long as necessary to achieve the purposes described above, in accordance with applicable legal requirements or, where such requirements are not specified, according to the timeframes outlined below:

- Personal data contained in your Curriculum Vitae (CV) are retained for a maximum of 6 months from the date of your last update, unless the recruitment process results in your selection; in that case, the CV will be stored in the employee file. At the end of the eleventh month, an email will be sent inviting the applicant to update his/her data or CV; if the applicant does so, the data will be retained for an additional 6 months.
- Personal data collected following the exercise of data subject rights are retained for 10 years from the last recorded entry, in accordance with Article 2220 of the Italian Civil Code.
- In general, for all matters not expressly specified, a 10-year retention period applies, as provided by Articles 2220 and 2946 of the Italian Civil Code.

## What Are Your Rights Regarding the Protection of Your Personal Data

In relation to the processing of your personal data, you have the following rights: access, rectification, erasure, restriction of processing, data portability, withdrawal of consent, and objection, which you may exercise using the methods described in the following section, *“How You Can Exercise Your Rights Regarding the Protection of Your Personal Data.”*

You also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali). More information is available at: [www.garanteprivacy.it](http://www.garanteprivacy.it)

<sup>2</sup> These parties, in accordance with the GDPR, are designated as data processors and/or persons authorised to process the data, or they act as independent or joint controllers, and perform technical, organisational, or operational tasks. These may include, for example: Generali Group companies and other service providers, such as companies providing IT, telecommunication, financial, administrative, archiving, mail management (incoming and outgoing), hotel booking and travel arrangements, training, accounting audit, and financial statement certification services.

There are also other public or private entities, such as the Ministry of Labour and Social Policies, the Ministry of Economy and Finance (Revenue Agency), INAIL, INPS, trade unions, and tax collection agencies, to whom data disclosure is mandatory

<sup>3</sup> Generali Group companies and other service providers, including companies that provide IT, telecommunication, financial, administrative, archiving, mail printing and management (incoming and outgoing), hotel booking and travel arrangements, training, accounting audit, and financial statement certification services.

There are also other public or private entities, such as the Ministry of Labour and Social Policies, the Ministry of Economy and Finance (Revenue Agency), INAIL, INPS, trade unions, and tax collection agencies, to whom the disclosure of data is mandatory.

## How You Can Exercise Your Rights Regarding the Protection of Your Personal Data

- To find out which of your personal data are being processed by the Company, and to request the rectification (updating or modification) or, where possible, the erasure of your personal data held by the Company;
- To object to the processing of your personal data based on the legitimate interest of the controller or a third party, unless the controller or the third party demonstrates compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or where the processing is necessary for the establishment, exercise, or defence of legal claims; to object to the processing of your personal data for direct marketing purposes;
- If the processing carried out by the Controller is based on your consent, to withdraw the consent you have given, it being understood that the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;

you may write to:

Data Protection Officer – Generali Employee Benefits Business Service Center S.R.L., Via del Mulino, 4 – 20057 Assago (MI), or via email: [privacy@geb.com](mailto:privacy@geb.com)

## Amendments and Updates to This Privacy Notice

In light of potential future changes to applicable privacy legislation, the Controller may supplement and/or update this Privacy Notice, in whole or in part.

It is understood that any amendments, additions, or updates will be communicated in accordance with applicable law, including by publication on the website: [Generali Employee Benefits \(GEB\) Network](#) [XXXX]

This privacy notice was created on the 6<sup>th</sup> of November 2025.