

PRIVACY POLICY FOR APPLICANTS

This Privacy Policy for Applicants (the "**Policy**") applies to the processing of your personal data by Bending Spoons S.p.A. ("**Bending Spoons**", "**our**", "**we**" or "**us**") through job or recruiting events applications and job vacancy advertisements in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation ("**GDPR**"), the Italian Legislative Decree 196/2003 (as amended), Directive 2002/58/EC – ePrivacy Directive, and other applicable local laws (the "**Data Protection Laws**"). This Policy does not apply to the processing of applicants' data if and after they are hired by Bending Spoons.

1. Data Controller

The data controller is Bending Spoons S.p.A., with registered office in Corso Como 15, Milan (Italy). If you have any requests regarding the processing of your personal data, please email us at privacy@bendingspoons.com.

2. Data Protection Officer

You can contact our Data Protection Officer at dpo@bendingspoons.com for any request relating to the processing of your personal data or this Policy.

3. Purposes and Legal Bases

We will process the categories of personal data shown below, for the purposes and upon the legal bases indicated below:

Purpose	Legal basis	Categories of data
a. Your personal data is processed for the purpose of assessing your profile, qualifications, and skills, within the framework of our recruitment policy.	<p>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).</p> <p>Processing is also necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law (art. 9 (2) (b) of the GDPR).</p> <p>You have consented to the processing of your personal data for one or more specific purposes (art. 9(1)(a) of the GDPR).</p>	<p>Common data: name, surname, email, information relating to your qualifications, skills, academic and professional career, assessments and tests, skills and remuneration.</p> <p>Special categories of personal data: data related to your health, data revealing disabilities, data concerning sexual orientation, data revealing racial or ethnic origin, political opinions, religious or philosophical</p>

		beliefs, or trade union membership.
b. Your personal data may be processed for the purpose of the organization and booking of transfers, trips or events for the recruiting process.	<p>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).</p> <p>You have consented to the processing of your personal data for one or more specific purposes (art. 9(1)(a) of the GDPR).</p>	<p>Common data: name, surname, email, ID card or passport number.</p> <p>Special categories of personal data: data revealing food intolerances or religious beliefs.</p>
c. Your personal data may be processed for the purpose of complying with our legal obligations or other obligations arising out of the instructions received from the competent authorities.	<p>Processing is necessary for compliance with a legal obligation to which the data controller is subject (art. 6(1)(c) of the GDPR).</p> <p>Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment and social security and social protection law (art. 9 (2)(b) of the GDPR).</p>	<p>Common data: name, surname, email, data relating to your qualifications, skills, academic and professional career, assessments and tests, competences and remuneration data, ID card or passport number.</p> <p>Special categories of personal data: data related to your health, data revealing disabilities, data concerning sexual orientation, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership.</p>

4. Data Retention

The data collected in connection with your application will be processed for the time necessary to carry out the purposes mentioned above. If you are not selected for the vacancy or recruiting event you applied for, we might retain your data for longer to consider your candidacy for other suitable positions that we may open in the future, and in any case up to two years from the date of your original application.

5. Your Choices

Your personal data is necessary for us to process your application. If you do not provide such data, we will not be able to evaluate your candidacy and we will have to exclude you from the application process. If your application or CV contain special categories of personal data (for example, data revealing your health, your ethnic origin, sexual orientation, religious belief, political affiliation or trade union membership), we will only process such data strictly for the purpose of enabling you to take part in the recruiting process, and to comply with labour laws and regulations. With your prior consent, we may also process special categories of personal data when booking or organizing transfers, trips or events in connection with the recruiting process. Moreover, we may also collect personal data included in the special categories when you spontaneously share such data, or if you

are involved in transfers, trips or events related to our recruiting process and for which you wish to tell us about your possible food intolerances or religious beliefs.

We may process data relevant to evaluate your candidacy, including your skills, qualifications and professional capabilities in compliance with applicable labour laws and regulations, and only if such data is necessary for the establishment of an employment relationship of any kind or for the recruiting process. We may also process data when you spontaneously share it with us in connection with recruiting-related transfers, trips, or events. If do not provide us with any data required for these purposes, we may not be able to evaluate or consider your candidacy, while there would be no detrimental consequences for you in connection with recruiting-related transfers, trips or events. However, please note that we take no responsibility for any event related to your refusal to provide us with information such as food intolerances, and, for example, the catering does not suit your dietary restrictions.

6. Sharing Your Data

We may share or disclose your personal data to the following categories of recipients:

- Vendors carrying out activities that are related or instrumental to our business and operational activities as outsourced data processors appointed in writing in accordance with Applicable Privacy Laws, or acting as autonomous data controllers (such as IT or storage service providers, mobile measurement partners, suppliers of mobile marketing services, and advertising networks and platforms).
- If we carry out a corporate transaction or operation (for example, in case of bankruptcy, merger, acquisition, reorganization, sale of assets or assignments, and due diligence related to any such transactions), your personal data may be disclosed to our advisers and any prospective purchaser's advisers, and may be one of the assets that is transferred to another owner.
- Public, judicial or police authorities, within the limits established by applicable laws.

Personal data will not be disclosed for any reason other than those stated above, unless such disclosure is deemed necessary for the fulfilment of a legal obligation or if we request your consent.

7. Transfers of Data

We may transfer personal data from the European Economic Area ("EEA"), the UK or Switzerland to other countries outside the EEA. Such data transfers are based on appropriate safeguards in accordance with Applicable Privacy Laws, including (a) the standard contractual clauses developed by the European Commission; (b) the Swiss-U.S. Privacy Shield, and the decisions of adequacy of the European Commission; or (c) binding corporate rules. Copies of appropriate warranties are available for consultation by sending an email to privacy@bendingspoons.com.

8. Your Privacy Rights

You have the following rights, as specified in the GDPR:

- the right of access to your personal data
- the right to obtain the updating or rectification of your personal data
- under certain conditions pursuant Data Protection Laws, the right to obtain the cancellation of your personal data ("right to be forgotten"), the right to restrict the processing of your personal data, and right to data portability
- the right to object to the processing of your personal data under legitimate grounds
- where the processing is based on your consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal

To exercise your rights, you may contact us, in writing by sending a letter to our headquarters, or by

sending an email to privacy@bendingspoons.com.

You also have the right to lodge a complaint with the Italian Data Protection Authority or the competent national data protection or judicial authority.

9. Changes

We may modify or update this Policy, also in view of future changes in the Applicable Data Protection Laws or in case we implement new features or functionalities that will process personal data.

Last updated: 31 August 2021