



Privacy Notice for Job Applicants pursuant to Arts. 13 and 14 of Regulation EU 2016/679 ("GDPR")

ShopFully S.p.A., with registered office in Sestu (CA), Italy, via Imperatore Costantino 3 – 09028 ("ShopFully"), to protect the privacy of all job applicants who apply through the Careers section of the website <https://corporate.shopfully.com/of> ShopFully Group or through paper applications. This document ("Privacy Notice") has been written in order to allow you to understand how your Personal Data, as defined below, will be processed in the context of the recruiting process.

This Privacy Notice provides you with information so that you are able to provide your explicit and informed consent to the processing described below, where you wish to do so.

In general, any information or personal information you provide to ShopFully will be treated in accordance with the internationally recognised principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, data accuracy, data integrity and confidentiality.

1. Data controller and Data Protection Officer

ShopFully, as identified at the beginning of this Privacy Notice, is the data controller ("Data Controller") regarding all personal data processing carried out in the context of the recruiting process.

To get in touch with ShopFully's Data Protection Officer, please contact: dpo@shopfully.com

2. Personal Data processed

Through your application or your job interview, you may provide the Data Controller with professional and work information (e.g. university studies, knowledge of foreign languages, professional qualifications, preferred work place and career progress, useful social networks profiles, etc.) your photo and your cover letter ("Application").

a. Data provided by you or collected from public sources

Through your application, the Data Controller collects personal data that you provide (i) directly through your application to job positions found on the Career section of the website: <https://corporate.shopfully.com/> or (ii) indirectly from third parties who are freely available or professional sites (e.g. LinkedIn) referable to you, if publicly accessible, to have further useful information to assess your suitability to the job position for which you apply. Your Personal Data processed may consist of an identifier such as the name, identification number, on line identifier, or one or more features of your physical, physiological, psychological, economic, cultural or social identity which may permit your identification (hereinafter only "Personal Data").

Through your resume ("Resume") the Data Controller may collect the Personal Data of third parties (e.g. reference of individuals who recommend you). In this respect you are an autonomous data controller, and you assume all related legal obligations and responsibilities. In such case, you agree to fully indemnify ShopFully against any complaints, claims or demands for compensation for damages which may be brought against ShopFully because of the processing of this Personal Data brought by the third parties whose information have been unlawfully processed. In any case, you must acknowledge – thus assuming all related responsibilities – that this processing is based on an appropriate legal basis pursuant to Arts. 6 and 9 of the GDPR on which you can rely to lawfully give ShopFully this information.

b. Special Categories of Personal Data

ShopFully S.p.A. – Partita IVA/Codice fiscale: 03156531208 - REA: CA271193

Sede Legale: Via Imperatore Costantino 3 - 09028 Sestu (CA)

Sede Commerciale e Amministrativa: Via Giosuè Borsi 9 - 20143 Milano (MI)

Sede Operativa: P.zza Minghetti, 4/d - 40124 Bologna (BO)

Capitale Sociale sottoscritto e versato: € 50.000,00

Pec: doveconviene@pec.it

Codice destinatario fattura elettronica: A4707H7

Through your Resume you may disclose special categories of personal data, Special Personal Data, which is personal data that would potentially reveal your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health, sex life or sexual orientation as defined under art. 9(1) of the GDPR.

The Data Controller will not process such personal data unless: a) it is not necessary for the work relationship with you; b) in accordance with what it is provided by the applicable law and Italian Data Protection Authority's provisions; c) subject to your consent, without which it will not be possible to process such personal data.

Therefore, the Data Controller invites you to not communicate such information unless it is necessary for the establishment of the work relationship, also considering the particular tasks and/or the specificities of the professional profile for which you send your Application.

In the event that you spontaneously provide such personal data in your Resume, we inform you that you must give your explicit consent at the bottom of it, pursuant to art. 9(2)(a) of the GDPR and more precisely, by inserting the following sentence: "After having read the Privacy Notice for Job Applicants pursuant to Arts. 13 and 14 of Regulation EU 2016/679, I give my consent to the processing of my Personal Data as defined therein, for the purpose of Recruitment".

Any untrue statements made in the Application and/or during any phase of a job offer could lead to the interruption of the selection process or, if discovered during the course of the employment relationship, to the termination of the same.

3. Purpose, legal basis and mandatory/discretionary nature of the processing

Your Personal Data will be processed on the basis of the GDPR and, where relevant, on the basis of the authorisation issued by the competent supervisory authority which is currently in force, for the following purposes:

- a) to examine candidates' Applications with a view of a possible first contact and interview with them ("**Recruitment**");
- b) to comply with legal requirements that require the Data Controller to collect and/or further process certain types of Personal Data ("**Compliance**");
- c) to prevent or detect any abuse or fraudulent activities and thereby enable the Data Controller to defend itself in court ("**Abuse/Fraud**");
- d) to share candidate Applications with other companies that are part of the ShopFully Group so that they can evaluate them and contact you if they consider your application to be valid ("**Intra-Group Sharing**").

The legal basis that we use to process your Personal Data, according to the purposes indicated in paragraph 3, are the following:

Processing for the purpose of Recruitment is necessary to take your Application into consideration and in order to start the selection process with a view to offer you, when applicable, a job. It is not mandatory for you to provide ShopFully with your Personal Data for this purpose; however, if you do not, ShopFully will not be able to take your Application into consideration.

If you want to provide Special Personal Data (e.g. personal data related to your health condition, religion, etc.) ShopFully will need your specific consent, as indicated in point 2.b of this Privacy Notice.

Processing for the purpose of Compliance is necessary to comply with legal obligations. When you provide your Personal Data, the Data Controller must process it in accordance with the applicable law, which may

include retaining and disclosing your Personal Data to official authorities for compliance with tax, customs or other legal obligations.

The processing for the purpose Abuse/Fraud is necessary to prevent or detect any abuse or fraudulent activities and thereby enable the Data Controller to defend itself in court.

The processing for the purpose of Intra-Group Sharing is based on Data Controller's legitimate interest, according to the Recital 48 of the GDPR.

4. Recipients of Personal Data

Your Personal Data may be shared with

- persons, companies or professional firms providing ShopFully with advice and consultancy regarding accounting, legal, tax, recruiting and hosting providers or e-mail platform providers. They typically act as data processors on behalf of the Data Controller;
- persons authorised by the Data Controller to process Personal Data needed to carry out activities on behalf of the Data Controller, who have undertaken an obligation of confidentiality or who are subject to an appropriate legal obligation of confidentiality (e.g., employees of the Data Controller);
- entities which are part of the ShopFully Group, for Intra-Group Sharing purposes;
- public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with binding orders of those entities, and for Compliance, Abuse/Fraud purposes.

5. Transfer of Personal Data

Your Personal Data may be transferred to Recipients located in several different countries outside the European Economic Area. ShopFully implements appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, such as by relying on adequacy decisions from the European Commission, standard data protection clauses adopted by the European Commission, or other safeguards or conditions considered adequate to the transfer at hand. You can obtain more information by sending a written request to our DPO at the following address: privacy@shopfully.com.

6. Retention of Personal Data

The Data Controller shall retain Personal Data processed for the purposes of Recruitment for the time strictly necessary to achieve the above purpose and, in any case, for a period not exceeding 12 (twelve) months from receipt of the Application or the last update. The Data Controller reserves the right to contact applicants before the expiration of this period to request them to extend the retention period of their Personal Data or to request an update of the Application.

If no answer is received, Personal Data collected will be deleted. If the Application does not meet the requirements for the job position sought, or it is not of interest, it may be deleted immediately. If it contains Special Personal Data but is not accompanied by appropriate consent to processing, it will be immediately deleted.

The Data Controller shall retain Personal Data processed for Compliance purposes for the time provided for by specific legal obligations or by applicable legislation.

The Data Controller shall retain Personal Data processed for the purpose of preventing Abuses/Fraud for the time strictly necessary for such purpose, and therefore until it is required to retain it in order to protect itself in court and communicate it to the competent authorities.

The Data Controller shall retain the Personal Data processed for the purpose of Intra-Group Sharing until such purpose is met.

7. Your rights

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Capitale Sociale sottoscritto e versato: € 50.000,00

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Under Articles 15 and following of the GDPR, you are entitled to request from the Undertaking, at any time, access to your Personal Data, correction or erasure of your Personal Data, as well as to object to its processing. You are also entitled to request the restriction of the processing of your Personal Data in the cases set out in Article 18 of the GDPR, as well as to obtain the Personal Data you have provided to the Undertaking in a structured, commonly used and machine-readable format, in the cases set forth by Article 20 of the GDPR, as well as to oppose the processing of your Personal Data for the purpose of Intra-Group Sharing and to revoke your consent to the processing of your Special Personal Data provided for the purpose of Recruitment.

Requests must be sent in writing to the Data Controller at the following address: privacy@shopfully.com.

In any case, you are always entitled to lodge a complaint with the competent supervisory authority, under Art. 77 of the GDPR, if you believe that the Data Controller's processing of your Personal Data is in violation of the applicable law.

8. Date

This Privacy Notice, as last updated, is in force from 12/04/2022.

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