

Assa Abloy Italia SpA ("**Assa Abloy**" or the "**Company**"), with registered office at Via Bovaresa 13, San Giovanni in Persiceto (BO), email privacy.it.openingsolutions@assaabloy.com, hereby informs you that it collects and processes personal data in compliance with Regulation (EU) 2016/679, the General Data Protection Regulation ("**GDPR**"), as well as Legislative Decree no. 196 of June 30, 2003 (the "Privacy Code") and Legislative Decree no. 101 of August 10, 2018, adapting the Privacy Code to the GDPR (the "Adaptation Decree") - the GDPR, the Privacy Code, and the Adaptation Decree being collectively referred to herein as the "Italian Privacy Legislation"—thereby ensuring compliance with privacy principles and the exercise of data subjects' rights pursuant to and for the purposes of the Italian Privacy Legislation.

This document constitutes the Privacy Notice provided to you by Assa Abloy Italia Spa—acting as the Data Controller—in compliance with Article 13 of the GDPR, to explain your rights and the methods used for the collection and processing of the personal data you provided directly to the Company during your application (or which the Company obtained through a personnel recruiting agency acting as an independent Data Controller)—specifically via your curriculum vitae, forms and applications submitted or completed (also online), or otherwise during interviews and the selection process.

Personal data—including biographical and contact details, data regarding experience, qualifications, education, and skills, work history, your current employment and remuneration—may be collected and processed, as well as special categories of personal data capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic and biometric data; and data concerning health or sexual orientation (so-called "sensitive data").

This Notice applies exclusively to applications and candidacies submitted to, or through, Assa Abloy Italia Spa. Should you submit—or have already submitted—your application via the webpage <https://www.assaabloy.com/it/it/about-us/career>, your personal data may be acquired by and/or processed by Assa Abloy AB—the Company's parent company, which administers and manages the aforementioned webpage— and/or the company of the Group relevant for the specific position, acting as an independent Data Controllers.

Purposes and Methods of Data Processing

The purposes for which the personal—and in case sensitive—data provided by you are collected and processed relate to the management of personnel selection procedures aimed at facilitating potential future hiring, at the fulfilment of legal obligations, or the protection of the Company's position in judicial or administrative proceedings.

Your personal data will be processed—including through the use of electronic tools—by the Data Controller, as well as by any designated Data Processors and duly authorized personnel, in strict observance of all precautionary measures necessary to ensure their security and confidentiality, in accordance with and in compliance with the provisions set forth in Art. 32 of the GDPR.

Legal Basis and Consequences of Failure to Provide Data

The processing of your personal data for the purposes indicated above is based on Article 6(1)(b) of the GDPR, due to the necessity of taking pre-contractual measures at your request; Article 6(1)(c), for compliance with legal obligations; and Article 6(1)(f), for the legitimate interests of the Data Controller in ensuring the proper organization of work or protecting their position in legal proceedings.

The provision of data is mandatory. Failure to provide such data renders participation in the selection procedures impossible. However, please be informed that the applicant is under no obligation to include any sensitive data in their curriculum vitae.

Società e sede legale / Company and registered office

ASSA ABLOY Italia S.p.A.
Via Bovaresa, 13 - 40017
San Giovanni in Persiceto (BO)
Italy

Cap. Soc.: Euro 1.500.000 i.v.
C.F./Reg. Imp.: (BO) 02275750590
P.I./VAT: IT 02275750590
R.E.A.: BO-453182

Tel. +39 051 6812411
www.assaabloy.it
assaabloyitaliapec@legalmail.it

Ufficio di Roma / Rome office
Via dei Castelli Romani 12/A
00071 Pomezia (RM)
Italy

In any event, the processing of any sensitive data shall be carried out only if strictly necessary—in accordance with, and within the limits of, the provisions set forth in Measure No. 146 of June 5, 2019, issued by the Italian Data Protection Authority.

Retention of Personal Data

The aforementioned personal—and potentially sensitive—data concerning you will be retained for the period of time necessary to carry out the selection procedures or, in the event of a successful outcome, for the duration of the employment relationship. If, at the conclusion of the selection procedures, no job offer materializes—or if such an offer is not accepted—your personal data will be retained for a maximum period of 6 months from the date of receipt of your curriculum vitae. If, at any time, you believe that the purpose of our data processing has been fulfilled—specifically because it is no longer necessary or useful—we kindly ask you to notify us of this circumstance so that we may proceed with the immediate deletion of your data.

Communication of Data

The processing of personal data is carried out with the assistance of the Company's employees—who are duly authorized to perform such processing—and of technical service providers who support the purposes indicated above, acting in the capacity of Data Processors. These parties are provided only with the information necessary for the provision of their services and act in accordance with the instructions issued by the Company.

Given the international nature of Assa Abloy, during the selection process, your data may be transferred to other companies within the Group for appropriate assessment purposes, including to entities located outside the European Union. Prior to transferring personal data to such third countries, the Company implements the measures established by the GDPR (e.g., Standard Contractual Clauses adopted by the European Commission) to legitimize the data transfer and to ensure the protection and confidentiality of the data, even within those third countries.

Data Subject Rights

As a data subject regarding the processing of personal data, you have the right, at any time, to request an updated list of our data processors (i.e., our service providers) and of the parties to whom your personal data is disclosed, and to exercise the rights set forth in Articles 15 et seq. of the GDPR. These rights include: the right to access your personal data; to obtain confirmation as to whether or not such data exists; to be informed of its content and origin; to verify its accuracy or request its integration, updating, or rectification; and to request a restriction on the processing of said data. Furthermore, you have the right to request the erasure of your personal data if it has been processed in violation of the law, as well as the right to export your personal data to another data controller—including potential future employers—without hindrance. You also have the right to object, on grounds relating to your particular situation, to the processing of your data, unless the data controller demonstrates compelling legitimate grounds for the continued processing that override your interests, rights, and freedoms. Data subjects also have the right not to be subject to a decision based solely on automated processing that produces legal effects concerning them or significantly affects them. The aforementioned prohibition does not apply if the data subject has consented to the automated processing of their personal data, or if such automated processing is necessary for the conclusion or performance of a contract between the data subject and the data controller. Finally, data subjects have the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*) if they believe that their rights under the GDPR have been infringed as a result of the data processing. The rights described above may be exercised by submitting an informal request to the data controller. Requests addressed to the Data Controller may be submitted via registered letter or email to the address privacy.it.openingsolutions@assaabloy.com.

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Please note that, in the cases established by Article 2-undecies of the Privacy Code (as amended by the Implementing Decree), the exercise of your privacy rights may be delayed, restricted, or excluded; you will be notified of any such action via a reasoned communication provided to you without delay. In any event, you may exercise your privacy rights through the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*) by requesting a verification that the aforementioned delay, restriction, or exclusion is based on legitimate grounds.

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