

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](mailto: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 its practices regarding the collection and processing of personal data, including special categories of personal data ("sensitive data"), provided by you in connection with your employment application and attached curriculum vitae. 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—acting as an independent Data Controller.

### **Purposes and Methods of Data Processing**

The purposes for which the personal—and potentially sensitive— data provided by you and set forth in your curriculum vitae are collected and processed relate to the management of personnel selection procedures aimed at facilitating potential future hiring. Consequently, such data will be processed by the Company exclusively for purposes inherent to personnel selection procedures and to comply with applicable laws, contractual obligations, or regulations. 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.

### **Nature of Data Collection and Consequences of Failure to Provide Data**

The provision of your personal data for the purposes indicated above is required pursuant to Article 6(1)(b) of the GDPR and is mandatory. Failure to provide such data will render it impossible for you to participate in the selection procedures. We inform you that there is no obligation for an applicant to include any special categories of personal data (i.e., sensitive data) in their curriculum vitae. However, should you have manifestly disclosed your sensitive data within your curriculum vitae, such data will be processed during the selection phase pursuant to Article 9(2)(b) and (e) of the GDPR.

### **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

#### **Società e sede legale / Company and registered office**

**ASSA ABLOY Italia S.p.A.**  
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Via dei Castelli Romani 12/A  
00071 Pomezia (RM)  
Italy

useful—we kindly ask you to notify us of this circumstance so that we may proceed with the immediate deletion of your data.

### **Communication and Dissemination 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](mailto:privacy.it.openingsolutions@assaabloy.com).

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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