

Privacy Notice — Processing of Candidates' Personal Data

(Issued pursuant to Article 13 of EU Regulation 2016/679)

This notice, issued pursuant to Art. 13 of Regulation (EU) 2016/679 (hereinafter the “GDPR”), is intended to describe with full transparency how **Valmex S.p.A.**, acting as Data Controller, processes personal data concerning you (hereinafter “Personal Data”) in the context of personnel search, selection, and evaluation processes aimed at the possible establishment of an employment relationship.

Last updated: 26 January 2026

1. Identity and Contact Details of the Data Controller

Pursuant to applicable legislation, the Data Controller is **Valmex S.p.A.**, with registered office at Via Fiume, 6, 61030 – Lucrezia di Cartoceto (PU), VAT/Tax Code 01469410417.

To ensure the highest level of data protection compliance, the Company has appointed a **Data Protection Officer (DPO)**, who may be contacted for any matter relating to the processing of your personal data at the following e-mail address: **dpo@valmex.it**.

2. Purposes of Processing

The Controller processes your Personal Data for specific, explicit, and legitimate purposes strictly connected to human resources management, as analytically described below:

A. Personnel Search, Selection, and Evaluation:

Processing is aimed at analysing the candidate's professional profile, verifying the requirements for the open position (or for future positions in the case of unsolicited applications), managing interviews, and the possible establishment of an employment or collaboration relationship. This activity includes reviewing submitted CVs and information made available on professional platforms.

B. Establishment, Exercise, or Defence of a Legal Claim: Processing may be necessary to establish, exercise, or defend a right of the Controller in judicial or extrajudicial proceedings, including the management of any employment disputes or disputes relating to selection procedures.

3. Legal Bases for Processing

Each processing operation is based on one of the lawfulness conditions provided for by Art. 6 GDPR. Specifically:

- I. For the purpose referred to in **Section 2, letter A (Selection)**, processing is necessary for the **performance of pre-contractual measures** taken at the data subject's request, pursuant to Art. 6(1)(b) GDPR (spontaneous submission of a CV or response to a job advertisement).
- II. Regarding the retention of the profile for future suitable positions and consultation via professional tools (e.g. LinkedIn Recruiter), processing is also based on the **legitimate interest** of the Controller in selecting suitable candidates, pursuant to Art. 6(1)(f) GDPR.

- III. For the purpose referred to in **Section 2, letter B (Defence)**, processing is lawful as it is necessary for the pursuit of the **legitimate interest** of the Controller in protecting its rights, pursuant to Art. 6(1)(f) GDPR.

4. Categories of Personal Data Processed

Within the limits of the purposes and legal bases set out above, and in compliance with the data minimisation principle under Art. 5(1)(c) GDPR, the following categories of Personal Data are processed:

- IV. **Common Identification and Contact Data:** Including, by way of example and not limitation: first name, surname, date and place of birth, residential address/domicile, telephone numbers, e-mail addresses, and photograph (if included in the CV).
- V. **Curricular and Professional Data:** Information relating to educational and training background, previous work experience, technical and language skills, membership of protected categories, current contractual and salary arrangements, and any other relevant information included in the CV or LinkedIn professional profile.
- VI. **Special Categories of Data (Art. 9 GDPR):** The Controller does not request the submission of “sensitive” data (e.g. health data, religious beliefs, political opinions). However, should you voluntarily provide such information (e.g. by indicating membership of protected categories for reserved quota purposes pursuant to Law No. 68/99), processing will take place in accordance with Art. 9(2)(b) GDPR, in relation to employment law and social protection, or on the basis of the explicit consent inferred from the spontaneous submission.

5. Data Retention Period

Personal Data are retained for no longer than is necessary to achieve the purposes for which they are processed, in accordance with the storage limitation principle under Art. 5(1)(e) GDPR. The specific criteria are as follows:

- VII. Data relating to the application and the CV will be retained for a period of **24 months** from the date of receipt or from the last interaction with the candidate (e.g. profile update). Upon expiry of this period, data will be deleted or irreversibly anonymised, unless you request earlier erasure.
- VIII. Should the conditions for the defence of the Controller’s rights before a court be met, data may be retained for the ordinary limitation period of **10 years**, in accordance with applicable legal obligations.

6. Source and Origin of Data

Personal Data subject to processing are collected:

- IX. Directly from the data subject, through the spontaneous submission of a CV by e-mail or via the “Work with Us” section of the company website.
- X. From third parties, through consultation of public professional databases, specifically the **LinkedIn** platform, where you have made your professional profile public. Please note that Valmex S.p.A. uses the *LinkedIn Recruiter* tool to identify profiles matching open positions.

7. Categories of Recipients and Data Communication

Personal Data are not subject to indiscriminate disclosure. They may be communicated to parties entitled to access them by virtue of legal provisions, regulations, and EU legislation, or to specific third parties designated, where necessary, as Data Processors pursuant to Art. 28 GDPR. Such categories include:

- XI. Internal HR personnel and departmental managers involved in the selection process, duly authorised and instructed on confidentiality obligations.
- XII. Providers of technical and IT services necessary for business operations (e.g. hosting providers, IT maintenance suppliers, suppliers of the HR management software **INAZ HE**).
- XIII. LinkedIn Corporation (and LinkedIn Ireland Unlimited Company), as provider of the recruiting platform.

8. Transfer of Personal Data Outside the European Economic Area

Personal Data are primarily stored on servers located within the European Union. However, the use of the LinkedIn platform and productivity tools may result in the transfer of certain data to third countries (in particular the United States).

Such transfers are legitimised by the providers' adherence to the *Data Privacy Framework* (where applicable) or, alternatively, by the execution of Standard Contractual Clauses (SCCs) approved by the European Commission, which ensure adequate safeguards for data subjects' rights pursuant to Art. 46 GDPR.

9. Security Measures Adopted

The Data Controller, in compliance with the integrity and confidentiality principle under Art. 5(1)(f) GDPR and following a thorough risk assessment, implements appropriate technical and organisational security measures pursuant to Art. 32 GDPR, aimed at preventing data loss, unlawful or incorrect use, and unauthorised access.

Specifically, access to databases is permitted exclusively through authentication credentials reserved to authorised personnel; systems are protected by up-to-date firewalls and antivirus solutions; periodic backup procedures are implemented to ensure the availability and resilience of systems.

10. Absence of Automated Decision-Making Processes

The data subject is hereby specifically informed that Valmex S.p.A. **does not employ any automated decision-making process**, including profiling, as referred to in Article 22(1) and (4) GDPR.

Selection and evaluation activities are entrusted exclusively to human professionals' intervention and judgement. No automatic ranking software or artificial intelligence algorithms are used for the automatic exclusion or grading of candidates.

11. Exercise of Data Subject Rights

Articles 15 to 22 GDPR confer upon data subjects the exercise of specific rights. The data subject may at any time request the Controller to:

- **Access** their Personal Data (Art. 15);
- **Rectification** of inaccurate data or completion of incomplete data (Art. 16);
- **Erasure** of data (“right to be forgotten”) where the conditions are met (Art. 17);
- **Restriction** of processing (Art. 18);
- **Portability** of data in a structured format (Art. 20);
- **Objection** to processing on grounds relating to the data subject’s particular situation (Art. 21).

Requests for the exercise of rights may be submitted to: **privacy@valmex.it**, or by contacting the DPO at **dpo@valmex.it**. The right to lodge a complaint with the competent supervisory authority is also preserved (in Italy, the *Garante per la Protezione dei Dati Personali*), pursuant to Art. 77 GDPR.

12. Nature of Data Provision

The provision of Personal Data (CV and contact details) is voluntary but **necessary** in order to participate in selection procedures. Any refusal to provide such data will make it impossible for the Controller to evaluate your application and to proceed with the possible establishment of an employment relationship.

Summary Table of Processing Activities

ID	Categories of Data Processed	Purpose of Processing	Legal Basis (GDPR Art.)	Retention Period
A	Identification, contact, curricular, professional data, photo, LinkedIn profile data	Personnel search, selection and evaluation (incl. candidate database management)	Performance of pre-contractual measures (Art. 6.1.b); Legitimate Interest (Art. 6.1.f)	24 months from receipt or last interaction (unless earlier erasure requested)
B	All categories of data collected (if necessary)	Establishment, exercise or defence of a legal claim	Legitimate Interest of the Controller (Art. 6.1.f)	10 years (ordinary limitation period)