

Information Notice pursuant to Article 13 of the European Regulation for the protection of personal data no. 679/2016 ("GDPR")

Pursuant to and in accordance with Articles 13 and 14 of Regulation (EU) No 679/2016 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter also referred to as the "Regulation" or "GDPR"), we hereby inform you that the personal data you voluntarily provide or make available to **Rulex Innovation Labs S.r.l.** (hereinafter also referred to as "**Data Controller**" or "**Company**") shall be processed in compliance with current legislation on the protection of personal data and, in any case, with the principles of confidentiality which inspire the activity of the Company.

Data Controller

The Data Controller of the processing of your personal data is:

Rulex Innovation Labs S.r.l.

Via Felice Romani n. 9, Genova

In addition to the above address, the Data Controller can be contacted at the following e-mail address:

gdp@rulex.ai

Definitions

In accordance with Article 4 of the GDPR:

- "personal data" means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- "processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Purpose of the Processing

The personal data you provide will be:

- processed by paper, electronic or telematic means, exclusively for the following purposes:
 - a) to send information and commercial communications, including promotional communications (including our newsletter), advertising material and/or offers of goods and services;
 - b) to manage any requests for services and/or information that are sent by e-mail to rulex@pec.collabra.it;
 - c) to manage spontaneous requests for professional insertion;
 - d) to evaluate the professional profiles of interest that emerge from the curricula vitae spontaneously sent by e-mail to rulex@pec.collabra.it or following further and different transmissions of data by you (i.e. at our headquarters) and manage all stages related to the search in and selection of candidates of interest (communications to interested parties, interviews and evaluation, etc.);
- processed lawfully, fairly and in full compliance with current legislation;
- accurately collected and, where necessary, kept up to date;
- processed in a relevant and comprehensive manner, for specific and legitimate purposes and within the limits of the purposes for which they are collected

Legal basis of the processing and possible consequences of withholding data

The Company collects personal identifying information (i.e. name, surname, address, telephone number, e-mail address and any other data that is functional to the processing), bearing in mind that the above information is processed only if provided voluntarily by the data subject.

You must obtain your specific consent, pursuant to Art. 6, letter a), and Art. 7 of the GDPR, for the purposes referred to in paragraph "Purposes of the Processing", letter a). Therefore, we inform you that your consent to such processing is optional with the consequence that you may decide not to give your consent, or to revoke it at any time (with the consequent impossibility for the Data Controller to carry out the related processing).

For the purposes referred to in letters b), c) and d), the consent to the processing of such data is not necessary pursuant to Articles 6 and 9 of the GDPR, as the processing itself concerns data contained in: i) requests made

spontaneously to the e-mail address of the Company for the sole purpose of responding to such requests; ii) in the curricula voluntarily sent by the data subject for the purpose of any establishment of a working relationship/collaboration.

However, with regard to the data subsequently requested by the Data Controller, failure to provide such data could: i) make it impossible to proceed with the start of a possible selection process, or to verify the conditions for the establishment of a working relationship/collaboration; ii) not allow the management of and response to requests made by the data subject.

Recipients of personal data

For the purposes referred to in the paragraph "Purposes of processing", the personal data you provide may be made accessible, pursuant to art. 13 of the GDPR:

- to the staff of the Data Controller, each for their respective profiles of competence;
- to companies entrusted by the Data Controller for the management of the sending of information and promotional communications, also of a commercial nature, advertising material and/or offers of goods and services;
- companies, professional firms or consultants that provide assistance to the Data Controller in accounting, administrative, legal, tax and financial matters in relation to the provision of the services requested;
- to subjects, bodies or authorities to whom the communication of your personal data is mandatory under the provisions of the law or orders of the authorities;
- subjects or companies responsible for the management and maintenance of the IT and web platform of the Data Controller and external suppliers through which the services requested are provided or for which consent has been given.

Particular Data Processing

We inform you that, should the Data Controller process data that the GDPR defines as "particular" because they are suitable for revealing racial or ethnic origin, religious, philosophical or other beliefs, as well as personal data that may reveal the state of health, any processing can only take place under one of the conditions set forth in art. 9 of the GDPR or after appropriate information and your explicit written consent.

Data Retention and Transfer of Personal Data Abroad

The data collected will be kept (in electronic or paper files) for the time strictly necessary for their processing and in any case no later than the period provided for by current legislation and / or the recommendations of the Guarantor for the Protection of Personal Data or until any revocation of the consent you may give.

With regard to the personal data contained in curricula vitae voluntarily transmitted, we inform you that they will be kept for up to a maximum of 24 months and subsequently will be deleted, unless you indicate otherwise. We also inform you that your data will be collected, processed and stored in full compliance with the provisions of Articles 32 and seq. of the GDPR - on security measures.

For the purposes described above, personal data (excluding particular categories of personal data) are transferred to countries outside the European Union and, in particular:

- United States of America: in this case, the transfer is based on the existence of adequate safeguards and, in particular, on the adherence of the data recipient companies to the so-called "Privacy Shield" (Decision (EU) 2016/1250 of the Commission of 12 July 2016 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the protection offered by the EU-US Privacy Shield regime).

If the transfer of your personal data by the Data Controller to a country outside the European Union or to an international organisation is envisaged, in the absence of an adequacy decision in accordance with Article 45, par. 3, or of adequate safeguards in accordance with Article 46, including standard contractual clauses approved by the European Commission or binding corporate rules (Article 47), the transfer or set of transfers of personal data to such third country or international organisation shall take place only if the conditions set forth in Article 49 of EU Regulation 679/2016 are met, or after having provided adequate information and obtained your explicit consent.

Rights of the Data Subject

Pursuant to and for the purposes of the GDPR, you have the following rights as a data subject that you may exercise against the Data Controller:

- Right of access: to obtain confirmation as to whether or not personal data relating to you are being processed and, if so, to receive information relating, in particular, to the purposes of the processing, the categories of personal data processed and the retention period to which they may be disclosed (art. 15 GDPR);
- Right to rectification: to obtain, without undue delay, the rectification of inaccurate personal data concerning you and the integration of incomplete personal data (art. 16 GDPR);
- Right to erasure: obtain, without undue delay, erasure of personal data concerning you, in cases provided for by the GDPR (art. 17 GDPR);
- Right to restriction of processing: obtain from the Data Controller the restriction of processing, in the cases provided for by the GDPR (art. 18 GDPR);
- Right to data portability: receive in a structured format, commonly used and readable by an automatic device, the personal data provided by you to the Data Controller, and ensure that they are transmitted to another data controller without hindrance, in the cases provided for by the GDPR (art. 20 GDPR);
- Right to object: object to the processing of personal data concerning you, unless there are legitimate reasons for the Data Controller to continue the processing (art. 21 GDPR);
- Right to lodge a complaint with the supervisory authority: lodge a complaint with the Data Protection Authority, Piazza Venezia n. 11 - 00187 Roma (RM).

It should be noted that the revocation of consent for the processing of data for which consent is requested does not affect the lawfulness of processing based on consent prior to revocation.

The above-mentioned rights may be exercised by sending a request by registered letter or e-mail to the addresses indicated above, using the form available on the website of the Guarantor Authority for the protection of personal data <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>.