

PRIVACY NOTICE

PROTIVITI ITALIA

Effective Date: 1 July 2026

Last Updated: 1 July 2026

1. Introduction

- 1.1. This privacy notice ("**Notice**") describes how Protiviti Italy, as defined below, processes personal data in connection with institutional, informational, commercial, professional and recruiting interactions with individuals, including, by way of example, interactions with website visitors, professional contacts, representatives of clients, prospective clients, suppliers and partners, participants in events, webinars or initiatives, candidates participating in recruitment processes, and visitors to corporate offices.
- 1.2. This Notice applies, in particular, to the processing of personal data carried out in connection with:
 - 1.2.1. browsing and use of Protiviti Italy's website;
 - 1.2.2. contact requests, information requests or communications submitted through the website or through the contact details indicated therein;
 - 1.2.3. institutional, commercial and marketing communications, within the limits permitted by applicable law;
 - 1.2.4. organization and management of events, webinars, conferences, surveys and other initiatives promoted by or involving Protiviti Italy;
 - 1.2.5. management of professional contacts, business relationships and relationships with representatives of clients, prospective clients, suppliers, partners and other professional interlocutors;
 - 1.2.6. receipt, assessment and management of applications, CVs, interviews and recruitment processes, regardless of the channel through which the application was received;
 - 1.2.7. access by visitors to Protiviti Italy's corporate offices;
 - 1.2.8. management of requests submitted by data subjects in connection with the exercise of their rights under personal data protection laws.
- 1.3. This Notice does not govern the processing of personal data for which Protiviti Italy provides dedicated privacy notices, including, in particular, processing relating to employees, contracted external collaborators, whistleblowing reports and other specific activities that may be subject to a separate privacy notice.
- 1.4. With specific reference to candidates, this Notice governs the processing carried out during the application, selection, pre-employment or pre-contractual assessment phase and, where applicable, the management of activities preliminary to a potential onboarding. In the event of hiring, commencement of an internship, establishment of a collaboration relationship or any other contractual relationship with Protiviti Italy, further dedicated privacy notices will be provided in relation to the processing connected with such relationship.
- 1.5. When Protiviti Italy processes personal data on behalf of a client in the context of the provision of its professional services, Protiviti Italy acts, as the case may be, as processor or sub-processor. Such processing is governed by the applicable contractual arrangements, including, where relevant, specific Data Processing Agreements, processor appointment

documents or equivalent agreements. In such cases, this Notice does not replace the privacy notice provided by the client in its capacity as controller, where applicable.

2. Definitions

2.1. For the purposes of this Notice, “**Protiviti Italy**” means, collectively:

2.1.1. Protiviti S.r.l.

- a. Registered office: Via Tiziano 32, 20145 Milan (MI), Italy
- b. VAT / Tax Code: 04156610968;
- c. REA: 1729797
- d. Certified e-mail address (PEC): protiviti@poste-certificate.it

2.1.2. Protiviti Government Services S.r.l.

- a. Registered office: Via Tiziano 32, 20145 Milan (MI), Italy
- b. VAT / Tax Code: 09692380968
- c. REA: 2107311
- d. Certified e-mail address (PEC): protivitigs@pec.it

2.2. Each of the companies indicated above acts as an independent controller for the processing activities falling within its respective area of responsibility. The relevant controller will be identified, from time to time, as the Protiviti Italy company with which the data subject interacts, that organizes the initiative, receives the request, establishes the professional or contractual relationship, manages the recruitment process, or otherwise determines the purposes and means of the specific processing activity.

2.3. The companies indicated above belong to the same corporate group, adopt aligned procedures and operating standards in the area of personal data protection, and may share, to the extent necessary, resources, organizational tools, information systems and technical safeguards. Such sharing does not, in and of itself, imply a joint determination of the purposes and means of processing.

3. Privacy Contacts

3.1. Protiviti Italy, as part of a multinational group operating across multiple jurisdictions, relies on the support of a global privacy team composed of professionals with expertise in personal data protection in different countries and regions, including, by way of example, the United States of America, the United Kingdom and the European Union.

3.2. For any request concerning the processing of personal data Protiviti Italy may be contacted at the following e-mail address: privacy_protiviti_it@rhi.com.

4. Categories of Personal Data Processed

4.1. Depending on the specific interaction and the purposes pursued, Protiviti Italy may process the following categories of personal data:

- 4.1.1. Identification and contact data, such as first name, last name, e-mail address, telephone number, address, country, company or organization of affiliation.
- 4.1.2. Professional data, such as role, job title, corporate function, department, industry sector, professional area, information relating to the company or organization of affiliation, and professional preferences relevant to Protiviti Italy’s communications or initiatives.

- 4.1.3. Data contained in communications, such as the content of messages sent through forms, e-mail or other contact channels, information requests, reports not falling within the whistleblowing channel, documents, attachments and any further information voluntarily communicated by the data subject.
- 4.1.4. Browsing and technical data, such as IP address, device identifiers, browser and operating system data, language, access date and time, pages visited, technical logs, security data, diagnostics and website functionality data.
- 4.1.5. Data relating to events, webinars and initiatives, such as registration, participation and attendance data, organizational or logistical preferences, feedback, survey responses, images, photographs and audio/video recordings, where collected.
- 4.1.6. Data relating to applications and recruitment processes, such as data contained in CVs, professional experience, educational background, skills, qualifications, certifications, languages, information contained in cover letters or candidate communications, information collected during interviews or assessments, evaluations relating to the application, outcomes of the recruitment process, salary expectations, expected salary package, availability, professional preferences, data contained in documents requested during the pre-employment or pre-onboarding phase, such as identity documents, degree certificates or equivalent self-certifications and, where applicable, documentation required for specific types of onboarding, such as the declaration of immediate availability for extracurricular internships.
- 4.1.7. Administrative, contractual and commercial data relating to professional contacts, such as data of representatives of clients, prospective clients, suppliers, partners and other professional interlocutors, correspondence, data contained in contractual or administrative documentation and information necessary for the management of the relationship.
- 4.1.8. Data relating to access to corporate offices, such as first name, last name, company or organization of affiliation, internal contact person, date and time of entry and exit, and any information necessary to manage access and office security.
- 4.1.9. Data relating to the exercise of privacy rights, such as identification and contact data of the requester, content of the request, information necessary to verify the requester's identity, correspondence and documentation relating to the management of the request.
- 4.2. This Notice does not concern, except where indicated for completeness or by way of cross-reference, processing activities relating to employees and contracted external collaborators, for whom dedicated privacy notices are provided through the relevant channels.
- 4.3. In the context of the interactions described in this Notice, Protiviti Italy does not intend to collect special categories of personal data pursuant to Article 9 of the GDPR, such as, by way of example, data concerning health, religious beliefs, political opinions or trade union membership, unless this is strictly necessary in connection with specific circumstances provided for by applicable law or requests made by the data subject.
- 4.4. With specific reference to recruitment processes, Protiviti Italy does not require candidates to provide special categories of personal data, unless this is strictly necessary in connection with specific circumstances provided for by applicable law or requests made by the data subject. If a candidate voluntarily provides information relating, for example, to disabilities, health conditions, protected-category status or similar information, Protiviti Italy will process such data only to the extent necessary, in accordance with principles of minimization and confidentiality, and, where possible, will limit internal circulation of the information to authorized personnel only and to the information strictly necessary.

- 4.5. In particular, where information relating to disabilities, health conditions or specific needs of a candidate is relevant for the organization of the recruitment process or for assessing compatibility with the position, Protiviti Italy may process such information in compliance with applicable law and with enhanced confidentiality measures, limiting, where possible, internal communication to strictly necessary information, such as any organizational needs or indications of compatibility with the position, without disclosing unnecessary details.
- 4.6. Protiviti Italy does not collect data relating to criminal convictions and offenses pursuant to Article 10 of the GDPR in the context of the ordinary interactions governed by this Notice. Such data may be processed only where necessary and permitted by applicable law, for example in relation to specific checks permitted by applicable law, compliance with legal obligations, management of disputes or the establishment, exercise or defense of legal claims.

5. Sources of Data

- 5.1. Personal data may be collected:
- 5.1.1. directly from the data subject, for example through browsing of the website, completion of forms, sending of e-mails, participation in events or webinars, requests for information, subscription to communications or initiatives, access to corporate offices, exercise of privacy rights, submission of applications, participation in interviews or communications with Protiviti Italy in the context of a recruitment process;
 - 5.1.2. from clients, prospective clients, suppliers, partners or other organizations, for example where such parties provide names and contact details of their representatives, employees, collaborators or officers in the context of commercial, contractual, project-related or institutional relationships;
 - 5.1.3. from recruiting channels, portals and professional platforms, such as LinkedIn, other recruitment portals, ATS systems, e-mail addresses dedicated to recruiting, including joinus@protiviti.it, unsolicited applications, internal referrals, search and selection firms, universities, training institutions or other channels used to collect and manage applications;
 - 5.1.4. from documents and information provided by the candidate during the recruitment process, including CVs, cover letters, educational documentation, self-certifications, identity documents, declarations requested during the pre-employment or pre-onboarding phase and further information made available by the candidate during interviews, assessments or communications with Protiviti Italy;
 - 5.1.5. from public or professional sources, such as corporate websites, public registers, professional directories, professional platforms, professional social media channels or other publicly accessible sources, within the limits permitted by applicable law and consistently with the purposes pursued;
 - 5.1.6. from operational suppliers or partners, for example in connection with the organization of events, webinars, conferences, commercial or institutional initiatives, management of digital platforms, registration tools, support services, recruitment processes or pre-employment activities;
 - 5.1.7. from information systems, digital tools and security systems, for example in connection with website browsing, access registration, information security or internal tools used to manage recruitment processes.
- 5.2. Third-party platforms used for applications, such as LinkedIn or other portals, process personal data in accordance with their respective privacy notices. Once an application is

made available to Protiviti Italy or transmitted to Protiviti Italy's recruiting channels, the relevant personal data are processed by Protiviti Italy in accordance with this Notice.

6. Nature of Data Provision

- 6.1. The provision of personal data may be necessary or optional depending on the context.
 - 6.1.1. With reference to website browsing, technical and browsing data are necessary to enable website functionality, ensure infrastructure security and prevent abuse. Without such data, the website may not function properly.
 - 6.1.2. With reference to contact requests, the provision of data marked as necessary is required to allow Protiviti Italy to manage the request and provide a response. Without such data, Protiviti Italy may not be able to respond to or follow up on the request.
 - 6.1.3. With reference to marketing communications, newsletters or promotional communications, the provision of data and, where required, consent is optional. Failure to provide consent or objection to the processing will result only in the inability to receive such communications.
 - 6.1.4. With reference to events, webinars and initiatives, certain data may be necessary to manage registration, participation, operational communications and organizational activities. Any consent to the use of images, photographs or audio/video recordings for promotional, institutional or external communication purposes is optional, unless the processing is otherwise based on another lawful basis within the limits permitted by applicable law and transparently disclosed to the data subject.
 - 6.1.5. With reference to recruitment processes, the provision of data contained in the CV, application communications and information requested during the process is necessary to allow Protiviti Italy to assess the application, manage the recruitment process and, where applicable, make an offer of employment or engagement. Failure to provide the necessary data may prevent Protiviti Italy from considering the application or continuing the recruitment process.
- 6.2. The provision of special categories of personal data is not required, unless required by applicable law or necessary in relation to specific circumstances. Candidates are invited not to include in their CVs or application communications information that is not relevant to the position or not necessary for selection purposes.
- 6.3. With reference to access to corporate offices, the provision of data requested for access registration may be necessary for reasons of physical security, internal organization, protection of persons and safeguarding of corporate assets. Without such data, Protiviti Italy may not allow access to the office.

7. Purposes and Legal Bases of Processing

- 7.1. Website browsing and security
 - 7.1.1. Protiviti Italy processes browsing and technical data to enable use of the website, ensure proper functioning of the pages, protect infrastructure security, prevent abuse, fraud or unauthorized access, manage incidents, and perform diagnostics and troubleshooting activities.
 - 7.1.2. The legal bases for the processing are Protiviti Italy's legitimate interest in security, business continuity and protection of its information assets, as well as, where applicable, compliance with legal obligations.
- 7.2. Contact requests and communications sent to Protiviti Italy

- 7.2.1. Protiviti Italy processes personal data to manage information requests, commercial requests, contact requests and communications submitted through forms, e-mail or other channels, as well as to respond, follow up, route the request to the competent team and manage the resulting professional relationships.
- 7.2.2. Requests submitted through the “Contact Us” section of the website may be routed to contatti@protiviti.it and managed by Protiviti Italy’s Marketing Team or by other competent functions, depending on the content of the request.
- 7.2.3. The legal bases for the processing are, depending on the content of the request, the performance of pre-contractual or contractual measures, Protiviti Italy’s legitimate interest in managing professional communications and, where applicable, compliance with legal obligations.

7.3. Institutional, informational, commercial and marketing communications

- 7.3.1. Protiviti Italy may process personal data to send institutional, informational, commercial or promotional communications, including updates on services, reports, publications, events, webinars, initiatives, thought leadership content and other communications relating to Protiviti Italy’s activities.
- 7.3.2. Protiviti Italy may also process personal data to manage distribution lists, communication preferences, opt-outs, unsubscribe requests, contact updates and documentation of the applicable legal basis.
- 7.3.3. The legal bases for the processing are:
 - a. the data subject’s consent, where required by applicable law;
 - b. Protiviti Italy’s legitimate interest, within the limits permitted by applicable law, for communications addressed to professional contacts, corporate representatives or persons with whom a professional or commercial relationship exists, always subject to the data subject’s right to object;
 - c. compliance with legal obligations, where applicable.
- 7.3.4. The data subject may object at any time to receiving marketing or promotional communications by using the opt-out mechanisms included, where applicable, in the communications received or by writing to the addresses indicated in this Notice.

7.4. Events, webinars, conferences, surveys and initiatives

- 7.4.1. Protiviti Italy processes personal data to organize, promote and manage events, webinars, conferences, surveys and other initiatives, including invitations, registrations, operational communications, participation management, follow-up, collection of feedback and measurement of the effectiveness of the initiative.
- 7.4.2. The legal bases for the processing are, depending on the context, the performance of pre-contractual or contractual measures, Protiviti Italy’s legitimate interest in organizing and managing its professional initiatives, the data subject’s consent, where required, and compliance with legal obligations.
- 7.4.3. Where photographs, images or audio/video recordings are collected in connection with events or initiatives for promotional, institutional or external communication purposes, including publication on official social media channels, Protiviti Italy will collect, where necessary, specific consent from the data subject or rely on another applicable legal basis, providing appropriate information.
- 7.4.4. Images or audio/video content may be published, where applicable, on the institutional channels of Protiviti Italy or of the group, including LinkedIn and Instagram, as well as on other channels indicated in connection with the specific initiative.

- 7.4.5. In certain cases, for example in the case of group shots, panoramic images, recordings of public events or content already disseminated on third-party channels, technical or organizational limitations may exist in relation to the possibility of fully removing content that has already been published or further shared by third parties. The data subject's right to withdraw consent, where given, or to exercise the rights provided by applicable law remains unaffected.

7.5. Recruitment processes, applications and recruiting

- 7.5.1. Protiviti Italy processes candidates' personal data to receive and manage applications, evaluate professional profiles, assess suitability for open positions or future opportunities, organize interviews, assessments and meetings, manage communications with the candidate, document the recruitment process, make potential offers of employment or engagement and manage pre-employment or pre-contractual activities.
- 7.5.2. Personal data may be collected and processed through different channels, including recruiting portals, professional platforms such as LinkedIn, ATS systems, dedicated e-mail addresses, including privacy_protiviti_it@rhi.com, corporate e-mail accounts, unsolicited applications, hand-delivered CVs, search and selection firms, internal referrals or other recruiting channels.
- 7.5.3. In the context of the recruitment process, Protiviti Italy may process data contained in the CV, data relating to educational and professional background, skills, qualifications, prior experience, professional expectations, internal evaluations relating to the application, interview outcomes, information necessary to manage the offer and pre-employment or pre-onboarding documentation.
- 7.5.4. For organizational, statistical, comparative and internal recruitment management purposes, Protiviti Italy may use internal tools, working files and corporate systems, including Microsoft tools, segregated folders, ATS systems and digital archives with access limited to authorized personnel. Such tools are used in accordance with the principles of minimization, necessity, confidentiality, proportionality and access segregation.
- 7.5.5. The legal bases for the processing are:
- a. the performance of pre-contractual measures taken at the request of the data subject, with reference to the receipt, assessment and management of the application;
 - b. Protiviti Italy's legitimate interest in the orderly, efficient, documented and secure management of recruitment processes, the comparison of professional profiles, the planning of organizational needs, the management of internal approvals and the protection of its rights;
 - c. compliance with legal obligations, where applicable, including in relation to specific types of onboarding, legal requirements or documentation requested during the pre-employment or pre-onboarding phase;
 - d. the data subject's consent, where required by applicable law for specific processing activities not otherwise based on another legal basis.
- 7.5.6. Protiviti Italy may process data relating to the candidate's expected salary package, in accordance with the laws and regulations applicable from time to time, in order to manage the selection, make potential offers, carry out comparative assessments and document the necessary internal approvals.
- 7.5.7. If, during the recruitment process, Protiviti Italy becomes aware of special categories of personal data, such data will be processed only to the extent necessary and with enhanced confidentiality measures. In particular, any information relating to disabilities, health conditions or specific needs of the

candidate will be shared internally only where strictly necessary and, where possible, in minimized form, for example by limiting the information shared to any organizational needs or compatibility with the position, without disclosing unnecessary details.

7.5.8. Once the recruitment process has been completed, if the candidate is selected, Protiviti Italy may process additional personal data and documents necessary for preparing the offer, obtaining internal approval, onboarding and potentially establishing the relevant relationship. At that stage, where necessary, further dedicated privacy notices will be provided in relation to the employment, internship, collaboration or other applicable contractual relationship.

7.5.9. Where the application is submitted through third-party platforms, such as LinkedIn or other recruiting portals, such platforms will process personal data in accordance with their respective privacy notices. Protiviti Italy will process the personal data received or made available through such platforms as an independent controller, in accordance with this Notice.

7.6. Professional contacts, clients, prospective clients, suppliers and partners

7.6.1. Protiviti Italy processes personal data of representatives, officers, employees, collaborators and contact persons of clients, prospective clients, suppliers, partners and other professional interlocutors to manage commercial, institutional, contractual, administrative and operational relationships.

7.6.2. Such processing may include, by way of example, management of commercial requests, preparation of offers, negotiation and management of contracts, invoicing, operational communications, supplier qualification, management of orders, administrative checks, management of disputes, fraud prevention, protection of rights and compliance with regulatory obligations.

7.6.3. The legal bases for the processing are, as applicable, the performance of pre-contractual or contractual measures, compliance with legal obligations, Protiviti Italy's legitimate interest in managing professional and commercial relationships, protecting its rights and properly organizing its business activities.

7.7. Processing carried out on behalf of clients

7.7.1. In the context of the provision of its professional services, Protiviti Italy may process personal data on behalf of its clients, acting, as the case may be, as processor or sub-processor.

7.7.2. In such cases, the processing is governed by the applicable contractual arrangements, including the client's documented instructions, processor appointment documents or other equivalent agreements, including, by way of example and without limitation, the relevant Data Processing Agreements. The legal bases for the processing generally fall within the responsibility of the client acting as controller.

7.7.3. This Notice does not replace the privacy notice that the client, as controller, is required to provide to data subjects, where applicable.

7.8. Visitors to corporate offices

7.8.1. Protiviti Italy processes personal data of visitors to its corporate offices to manage access to the offices, identify visitors, ensure the physical safety of persons, protect corporate assets, safeguard the confidentiality of corporate information and ensure proper organization of access.

7.8.2. The data processed may include first name, last name, company or organization of affiliation, internal contact person, date and time of entry and exit and any further information strictly necessary to manage access.

- 7.8.3. The legal bases for the processing are Protiviti Italy's legitimate interest in office security, protection of persons, safeguarding of corporate assets and protection of confidential information, as well as, where applicable, compliance with legal obligations.

7.9. Management of privacy requests and protection of rights

- 7.9.1. Protiviti Italy processes personal data to receive, manage and respond to requests from data subjects relating to the exercise of rights under personal data protection laws, as well as to manage any complaints, disputes, requests from authorities or needs relating to the protection of rights.
- 7.9.2. Such processing may include verification of the requester's identity, management of correspondence, retention of documentation relating to the request and adoption of the measures necessary to provide a response.
- 7.9.3. The legal bases for the processing are compliance with legal obligations, Protiviti Italy's legitimate interest in the proper and documented management of requests and the protection of rights.

7.10. Whistleblowing

- 7.11. With respect to whistleblowing reports under Directive (EU) 2019/1937, as implemented in Italy by Legislative Decree No. 24/2023, reference is made in full to the privacy notice published in the dedicated section of the website: <https://www.protiviti.com/it-it/whistleblowing-policy>.

8. **Cookies**

- 8.1. Protiviti Italy's website uses cookies and similar technologies, including necessary, analytics and marketing categories, managed through a cookie banner and consent management platform, where applicable.
- 8.2. For further information on definitions, categories of cookies, purposes, duration, third parties involved and methods for managing or changing preferences, please refer to the Cookie Policy available at the following link: <https://www.protiviti.com/it-it/cookies>.
- 8.3. The Cookie Policy forms an integral part of the privacy information framework relating to Protiviti Italy's website.

9. **Processing Methods and Security Measures**

- 9.1. Personal data are processed using digital, IT, telematic and, where necessary, manual tools, in compliance with the principles of lawfulness, fairness, transparency, minimization, accuracy, storage limitation, integrity and confidentiality set forth in Article 5 of the GDPR.
- 9.2. Protiviti Italy adopts appropriate technical and organizational measures pursuant to Article 32 of the GDPR, taking into account the nature, scope, context and purposes of the processing, as well as the risks to the rights and freedoms of data subjects.
 - 9.2.1. Such measures include, by way of example and without limitation, access control policies, segregation of duties, authorization management, logging and monitoring, encryption and protection of communications, backups, business continuity, vulnerability management, incident response, internal procedures, training of authorized personnel, confidentiality obligations, contractual clauses and checks on relevant suppliers and partners.
 - 9.2.2. With particular reference to recruitment processes, Protiviti Italy adopts access segregation measures and limits the internal circulation of information, including through dedicated folders, profiled access rights, corporate tools with limited

access and necessity-based criteria in relation to the functions involved in the process.

- 9.3. Protiviti Italy has structured a privacy and information security management system consistent with applicable law and integrated into a broader internal control and enterprise risk management model.
- 9.4. Protiviti Italy is certified under ISO/IEC 27001 and ISO/IEC 27701, within the limits and scope of the applicable certifications.

10. Recipients and Categories of Recipients

- 10.1. To the extent strictly necessary to pursue the purposes set out in this Notice, personal data may be disclosed or made accessible to the following categories of recipients:
 - 10.1.1. Authorized personnel of Protiviti Italy, including personnel from People & Culture, Marketing, Legal, Compliance & Privacy, IT, Finance, Purchasing & Back Office and other competent functions, based on criteria of necessity, relevance and authorization.
 - 10.1.2. Authorized personnel involved in recruitment processes, including representatives of the People & Culture Team, Managing Directors and/or representatives of the relevant business units, Legal, Compliance & Privacy, Finance, IT and other corporate functions involved, to the extent necessary and in accordance with access segregation criteria.
 - 10.1.3. Internal stakeholders involved in onboarding, where the candidate is selected, to the extent necessary to prepare the organizational, technical, administrative and operational activities required for onboarding.
 - 10.1.4. Group companies and centralized functions, where necessary for purposes of organizational, management, technical, IT, security, audit, compliance, incident management, privacy coordination, institutional communications, client management, recruiting processes, application management or other relevant group processes.
 - 10.1.5. Providers of IT, hosting, cloud, cybersecurity, maintenance, website management, CRM, marketing automation, webinar platform, event management, communication, survey, document storage, collaboration tool, workflow and electronic signature services, to the extent necessary for the provision of their respective services.
 - 10.1.6. Recruiting providers and platforms, including professional portals, ATS systems, providers of digital tools, storage, workflow and collaboration platforms, search and selection firms, universities, training institutions and other parties involved in the recruiting or pre-onboarding process.
 - 10.1.7. Professional advisors and other external suppliers, such as legal, tax and administrative advisors, auditors, insurers, brokers, technical consultants, communication agencies, photographers, videographers, event providers and other parties supporting Protiviti Italy in carrying out its activities.
 - 10.1.8. Clients, suppliers, commercial partners or contractual counterparties, where necessary for the management of professional, commercial, contractual or project-related relationships.
 - 10.1.9. Public authorities, judicial authorities, supervisory authorities, law enforcement agencies or other public bodies, where required by law, by an order of an authority or where necessary to establish, exercise or defend a legal claim.
- 10.2. External parties that process personal data on behalf of Protiviti Italy are appointed, where required, as processors pursuant to Article 28 of the GDPR or are otherwise bound by

appropriate contractual obligations regarding confidentiality, security and protection of personal data.

11. Transfers to Countries Outside the European Economic Area (“EEA”)

- 11.1. Due to the international organization of the group to which Protiviti Italy belongs, the use of IT tools and technology services, and the possible involvement of centralized functions, personal data may be transferred or made accessible also from countries located outside the European Economic Area (“EEA”), including, by way of example, the United States of America and the United Kingdom.
- 11.2. Such transfers or access may also concern tools used for application management, recruiting platforms, collaboration, storage, workflow, communication, information security, audit, technical support and group coordination systems.
- 11.3. Such transfers or access take place only to the extent necessary for the purposes indicated in this Notice and in compliance with Articles 44 et seq. of the GDPR.
- 11.4. Where personal data are transferred to countries for which the European Commission has adopted an adequacy decision, the transfer takes place on the basis of such decision.
- 11.5. Where no adequacy decision applies, Protiviti Italy ensures the adoption of appropriate safeguards, such as, by way of example, Standard Contractual Clauses approved by the European Commission, supplementary measures where necessary, intragroup agreements, supplier assessments or other mechanisms recognized under applicable law.
- 11.6. Where applicable and within the limits of its validity, Protiviti Italy may also rely on frameworks or mechanisms recognized by applicable law for international transfers, including the EU-U.S. Data Privacy Framework, where the recipient is validly certified and the transfer falls within the relevant scope of application.

12. Automated Decision-Making and Profiling

- 12.1. In the context of the interactions governed by this Notice, Protiviti Italy does not make decisions based solely on automated processing within the meaning of Article 22 of the GDPR that produce legal effects concerning the data subject or similarly significantly affect the data subject.
- 12.2. Any analytics, measurement, digital marketing or profiling activities carried out through cookies or similar technologies are governed by the Cookie Policy and by the preferences expressed by the data subject through the consent management platform, where applicable.
- 12.3. In the context of recruitment processes, Protiviti Italy does not make decisions based solely on automated processing that are capable of automatically excluding a candidate or producing similarly significant effects on the candidate's position. Any digital tools, pipeline files, ATS systems or internal support tools are used for organizational, documentary, comparative or process management purposes, without prejudice to evaluation by authorized personnel.

13. Data Subject Rights

- 13.1. Which rights may the data subject exercise?
 - 13.1.1. Right of access pursuant to Article 15 of the GDPR, namely the right to obtain confirmation as to whether or not personal data concerning the data subject are being processed and, where that is the case, to receive information on the processing and a copy of the personal data.

- 13.1.2. Right to rectification pursuant to Article 16 of the GDPR, namely the right to obtain correction of inaccurate personal data and completion of incomplete personal data.
- 13.1.3. Right to erasure pursuant to Article 17 of the GDPR, namely the right to obtain erasure of personal data in the cases provided for by applicable law.
- 13.1.4. Right to restriction of processing pursuant to Article 18 of the GDPR, namely the right to obtain restriction of processing in the cases provided for by applicable law.
- 13.1.5. Right to data portability pursuant to Article 20 of the GDPR, namely the right to receive the personal data provided by the data subject in a structured, commonly used and machine-readable format and to transmit those data to another controller, in the cases provided for by applicable law.
- 13.1.6. Right to object pursuant to Article 21 of the GDPR, namely the right to object to processing based on legitimate interest, including objection to processing for direct marketing purposes.
- 13.1.7. Right not to be subject to decisions based solely on automated processing pursuant to Article 22 of the GDPR, in the cases provided for by applicable law.
- 13.1.8. Right to withdraw consent pursuant to Article 7(3) of the GDPR, at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- 13.1.9. Right to lodge a complaint with the competent supervisory authority pursuant to Article 77 of the GDPR.
- 13.1.10. Right to an effective judicial remedy pursuant to Articles 79 and 82 of the GDPR, in the cases provided for by applicable law.

13.2. How may data subject rights be exercised?

- 13.2.1. To exercise the above rights, please write to privacy_protiviti_it@rhi.com.
- 13.2.2. Protiviti Italy may request reasonable information to verify the identity of the requester, where necessary, in order to prevent unauthorized access to personal data.
- 13.2.3. Protiviti Italy will respond without undue delay and in any event within one month of receipt of the request, unless the period is extended by up to two additional months in the case of particular complexity or number of requests, subject to a reasoned notice to the data subject.
- 13.2.4. In the case of manifestly unfounded or excessive requests, Protiviti Italy may refuse to act on the request or charge a reasonable fee, within the limits permitted by Article 12(5) of the GDPR.

14. Retention Periods

- 14.1. Protiviti Italy retains personal data for the time necessary to pursue the purposes for which they were collected and, where applicable, for the time necessary to comply with legal obligations, manage administrative needs, document the activities carried out, prevent abuse, manage disputes or establish, exercise or defend a legal claim.
- 14.2. In particular, unless a longer period is necessary for legal obligations, requests from authorities, litigation, internal investigations, incidents, security needs or protection of rights, the following retention criteria apply:
 - 14.2.1. Browsing data and technical logs: for the time strictly necessary to ensure website functionality, security, diagnostics and protection, according to the technical retention periods applicable to the systems used, unless security needs or the investigation of unlawful conduct require otherwise.

- 14.2.2. Contact requests not converted into a commercial or professional relationship: up to 24 months from closure of the request, unless further retention is necessary to document the management of the request, prevent abuse, manage disputes or protect rights.
- 14.2.3. Professional contacts, clients, prospective clients, suppliers and partners: for the duration of the professional, commercial or contractual relationship and thereafter for the period necessary to comply with legal obligations, retain administrative and accounting documentation, manage disputes or protect rights.
- 14.2.4. Contractual, administrative and accounting documentation: generally for 10 years, in accordance with applicable civil law, tax and accounting obligations, unless further retention is necessary for litigation or protection of rights.
- 14.2.5. Marketing, newsletters and promotional communications: until consent is withdrawn, opt-out is exercised or the data subject objects, without prejudice to periodic checks on the relevance, updating and accuracy of the data.
- 14.2.6. Events, webinars and initiatives: organizational and participation data are retained, as a rule, for 24 months from the conclusion of the event or initiative, unless further retention is necessary for legal obligations, reporting, disputes or protection of rights.
- 14.2.7. Photographs, images and audio/video recordings not published: for the period necessary to select, manage and produce the relevant content and, as a rule, no longer than 24 months from collection, unless consent is renewed, a different notice is provided to the data subject or further retention is justified.
- 14.2.8. Photographs, images and audio/video recordings published on institutional or social media channels: until consent is withdrawn, where the processing is based on consent, or for as long as publication remains consistent with the institutional, informational or promotional purposes for which the content was collected, subject to technical or legal limitations on the removal of content already disseminated, shared or further processed by third parties.
- 14.2.9. Surveys and feedback: up to 24 months from collection, unless anonymization, aggregation or further retention is necessary for analysis purposes, documentation of the initiative or protection of rights.
- 14.2.10. Corporate office access logs: as a rule, for 6 months from access, unless further retention is necessary for security needs, incident management, requests from authorities, internal investigations or protection of rights.
- 14.2.11. Applications, CVs and data relating to recruitment processes: as a rule, up to 24 months from receipt of the application or conclusion of the recruitment process, unless the application is updated, there is new contact with the candidate, the candidate is included in further recruitment processes, or retention is necessary for legal obligations, disputes or protection of rights.
- 14.2.12. Unsolicited applications: as a rule, up to 24 months from receipt, unless erasure is requested, an objection is raised, the application is updated or there is further interaction with the candidate.
- 14.2.13. Data contained in pipelines, shortlists, internal evaluations, comparative files or recruiting organizational tools: as a rule, up to 24 months from the conclusion of the recruitment process or the last useful update, unless anonymization, aggregation or further retention is necessary to document the process, manage disputes, carry out statistical analyses or protect rights.
- 14.2.14. Pre-employment or pre-onboarding documentation relating to selected candidates: where the relationship is established, such data and documents may be included in the personnel file or in the documentation relating to the relevant relationship

and will be retained in accordance with the retention periods indicated in the dedicated notices provided to employees, interns or collaborators.

14.2.15. Pre-employment or pre-onboarding documentation relating to candidates not selected or relationships not established: for the time strictly necessary to close the process and, as a rule, no longer than 12 months from the final decision, unless legal obligations, disputes or protection of rights require otherwise.

14.2.16. Privacy requests and exercise of rights: for the time necessary to manage the request and, thereafter, for the period necessary to document the response provided, manage any disputes, demonstrate compliance with applicable law or protect rights.

14.3. Once the applicable retention period has expired, personal data will be erased, anonymized or aggregated, unless further retention is necessary or permitted under applicable law.

15. Dedicated Notices and Processing Activities Outside the Scope of this Notice

15.1. This Notice does not replace dedicated privacy notices provided by Protiviti Italy in relation to specific categories of data subjects or specific processing activities.

15.2. In particular, please refer to the following.

15.2.1. Processing relating to employees is governed by the notice provided at the time the employment agreement is executed or otherwise in the context of the employment relationship.

15.2.2. Processing relating to external collaborators, or contractors, is governed by the notice attached to or provided in connection with the relevant collaboration agreement.

15.2.3. Processing relating to whistleblowing reports is governed by the dedicated notice available in the Whistleblowing section of the website.

15.2.4. Processing carried out by Protiviti Italy on behalf of clients, in its capacity as processor or sub-processor, is governed by the applicable contractual arrangements, processor appointment documents or other equivalent agreements, including the relevant Data Processing Agreements.

15.2.5. Processing carried out through video surveillance systems at Protiviti Italy's corporate offices is governed by a specific dedicated notice, provided through appropriate signage at the relevant offices and through an extended notice made available at the corporate offices where such systems are installed.

15.3. This Notice also governs processing relating to the application, selection, pre-employment or pre-contractual assessment phase and, where applicable, the management of activities preliminary to a potential onboarding.

15.4. In the event of hiring, commencement of an internship, establishment of a collaboration relationship or any other contractual relationship with Protiviti Italy, further dedicated notices will be provided in relation to the processing connected with the relationship established.

16. Links to Third-Party Websites, Platforms and Services

16.1. Protiviti Italy's website may contain links or references to third-party websites, platforms, services or channels, including, by way of example, social media platforms, recruiting platforms, event registration tools, webinar services or other group websites.

16.2. Personal data processing activities carried out independently by such third parties are governed by their respective privacy notices. Protiviti Italy is not responsible for processing carried out by third parties outside Protiviti Italy's sphere of control.

- 16.3. With specific reference to recruiting or professional platforms, such as LinkedIn or other portals, such platforms may process personal data for their own purposes and in accordance with their respective terms and privacy notices. Once the application or the candidate's personal data are made available to Protiviti Italy or transmitted to Protiviti Italy's recruiting channels, Protiviti Italy processes such data in accordance with this Notice.
- 16.4. Where Protiviti Italy uses third-party suppliers that process personal data on its behalf, such parties will be governed as indicated in this Notice, including, where required, appointment as processors pursuant to Article 28 of the GDPR or other appropriate contractual arrangements.

17. Final Provisions

- 17.1. Protiviti Italy will update this Notice whenever necessary as a result of legal, technological and/or organizational developments.
- 17.2. The updated version will be made available on Protiviti Italy's website, with indication of the effective date and the last update date.
- 17.3. This Notice is prepared in two identical versions, in Italian and English. In the event of any inconsistency between the two versions, the Italian-language version shall prevail.