



PRIVACY POLICY – JOB APPLICANT
(Article no. 13, European Regulation 679/16 "GDPR")

Pursuant to Article 13 of the European Regulation 679/16 ("GDPR") and in relation to your personal data in your resume or otherwise in your application, of which the company SKS365 Malta Ltd (hereinafter **SKS365** or "**Data Controller**") with registered office in Malta, Central Business Centre no. 135, Spinola Bay, St. Julian's, STJ3093, MT 2099 1236, and permanent establishment in Italy, Viale dell'Arte no. 25, 00144 - Rome, tax code and VAT No. 13747301003, email: privacy@sk365.com, PEC: sk365group@legalmail.it, has entered or will enter into possession of, whose contact details of the Data Protection Officer ("**DPO**") are as follows: email: dpo@sk365.com, tel: +39 0695584820.

We inform you of the following:

1. Purpose of Data Processing and Legal Bases: The processing is carried out by the Data Controller, by data processors under Article 28 of the GDPR, and by individuals authorized by the Controller under Article 29 of the GDPR for the following purposes:

- management of personnel recruitment and selection: the processing, regarding common data, is based on the fulfillment of pre-contractual measures, under Article 6.1. b) GDPR, requested by the data subject, as well as on the legitimate interest of the Data Controller, under Article 6.1. f) GDPR. If the processing involves data belonging to special categories, the legal basis for processing is the assessment of the employee's work capacity, under Article 9.2. h) GDPR;
- candidate evaluation: the processing, regarding common data, is based on the fulfillment of pre-contractual measures, under Article 6.1. b) GDPR requested by the data subject, as well as on the legitimate interest of the Data Controller, under Article 6.1. f) GDPR. If the processing involves data belonging to special categories, the legal basis for processing is the assessment of the employee's work capacity, under Article 9.2. h) GDPR;
- management of personal data for accounting and tax purposes: If the selection is successful, subject to the details in the Employee Privacy Policy that will be provided, data related to your remuneration and tax situation (e.g., contributions, salary, etc.) may be processed based on the fulfillment of contractual measures, under Article 6.1. b) GDPR and for the fulfillment of legal obligations of the Controller, under Article 6.1. c) GDPR. If the processing involves data belonging to special categories, the legal bases are the fulfillment of obligations and the exercise of the rights of the Controller or the data subject in labor law, safety, and social protection matters, under Article 9.2. b) GDPR, as well as the execution of

SKS365 Malta Limited

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P.IVA/C.F. 13747301003



CERTIFICATO 1468

Sede legale

Central Business Centre, Nr. 135, Level 2,
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Stabile organizzazione Italia

Viale dell'Arte 25
00144 Roma

Stabile organizzazione Serbia

Green Heart, Milutina Milankovica 11b
Belgrade 11070



preventive medicine or occupational medicine activities and the assessment of the employee's work capacity, under Article 9.2. h) GDPR;

- compliance with legal obligations, including those arising from a possible collective agreement; in the event of a successful selection, activities may include, for example, allocation of vacation, ROL (Reduction of Working Hours), enrollment in supplementary funds, use of company assets – such as cars, cell phones, laptops, etc. – training and development, subscription to insurance policies, accounting for travel expenses, monitoring of absences due to vacation and/or illness, performance evaluation, permissions, etc. The legal bases for these processing activities are, for common data, the fulfillment of contractual measures under Article 6.1. b) GDPR, the fulfillment of legal obligations to which the Data Controller is subject under Article 6.1. c) GDPR, and, finally, the legitimate interest of the Data Controller under Article 6.1. f) GDPR. If the processing involves data belonging to special categories, the legal bases for processing are the fulfillment of obligations and the exercise of the rights of the Data Controller or the data subject in labor law, safety, and social protection matters under Article 9.2. b) GDPR, as well as the execution of preventive medicine or occupational medicine activities and the assessment of the employee's work capacity under Article 9.2. h) GDPR.

For the purposes of managing personnel recruitment and candidate evaluation, providing data is necessary for receiving and reviewing the curriculum. Without this provision, the operation cannot be performed. To ensure the correct execution of all activities necessary or instrumental to the execution of the request, if necessary, the Data Controller may communicate personal data in this form to personnel selection companies, individuals with specific assignments, and companies within the SKS Group. Processing for additional purposes, such as managing personal data for accounting and tax purposes and fulfilling legal obligations, will only be carried out in the case of a positive outcome of the selection process. Finally, the Company may need to protect and defend its rights in legal proceedings in the event of disputes, claims, or litigation of any kind, and may need to process data or information related to you for this purpose. Depending on the circumstances of the specific case, the Company may process the necessary data to protect its interests in the appropriate venues.

3. Type of data processed and method of processing. Your personal data processed by the Data Controller are: name and surname, date of birth, work experience and contact details, as well as any information contained in your CV and/or application. We encourage you not to provide us with special categories of personal data referred to in Article 9 of the GDPR (such as data relating to racial or ethnic origin, political opinions, data relating to health) unless strictly necessary. Processing is carried out through operations or set of operations

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such as: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. These operations may be carried out with or without the support of electronic or otherwise automated tools. The processing is carried out by the Data Controller and/or the data processors and/or authorized subjects appointed for this purpose by the Data Controller.

4. Data conferral. Conferral of personal data is compulsory and necessary in order to carry out the activities listed under point 1.

5. Refusal to confer data. Any refusal by the data subject to confer personal data shall make it impossible to carry out the activities pursuant to point 1 and to fulfil legal requirements and the contract of employment.

6. Data communication. Your personal data may be communicated to the data processors and to any additional parties whose communication is necessary for the proper fulfillment of the purposes set forth in section 1 above.

7. Data dissemination and retention. Your personal data will not be disseminated, except for legal obligations, and are kept for a period of 6 (six) months from the relevant date of acquisition.

8. Data transfer to third countries. The data conferred may be transferred to the other operating offices of the same Data Controller located in Extra - EU countries, including Serbia.

9. Rights of the data subject. Article 15 et seq. of the GDPR give the data subject the right to exercise specific rights, including those of obtaining confirmation from the Data Controller as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data in intelligible form; the data subject has the right to know the source of the data, the purpose and methods of processing, the logic applied to the processing, the identification of the supervisor and subjects to whom data may be disclosed; the data subject also has the right to obtain the updating, rectification and integration of the data, its portability, erasure, transformation in anonymous form or blockage of any data processed in breach of the law; on legitimate grounds, the data subject has the right to oppose data processing. In order to exercise his or her rights, the data subject may address an appropriate request to the DPO at e-mail: dpo@sk365.com.

By signing this Privacy Policy, the undersigned declares that he/she has read the Privacy Policy and expressly and freely gives his/her consent to the processing of his/her personal data, including and possibly belonging to special data categories, in accordance with this Privacy Policy.

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