

DATA PROTECTION NOTICES  
CANDIDATES  
PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR")

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679, ("GDPR"), Metro Italia Cash and Carry SpA ("Data Controller" or "Controller") in its capacity as Data Controller, provides you with the following information pertaining to personal data ("Data") obtained in the context of registration for a user account to be used for performing job searches on the portal called "Taleo" or in order to comply with your specific requests or the data subject's subscriptions to further services.

1. DATA PROCESSING PURPOSES AND LEGAL BASIS

The Data will be processed for the following purposes:

- a. Registration of a user account to perform job searches by creating a complete personal profile. Through this account, it is possible to use the website to send job applications online and receive job offers matching the candidate's profile. A profile can be created by entering the personal data requested along with data concerning your professional background. Alternatively, you can import the desired professional information by accessing it through your LinkedIn® account. The legal basis that legitimises this data processing is the performance of pre-contractual measures adopted at your request, pursuant to Art. 6, paragraph 1 letter b) GDPR.
- b. Purposes associated with or essential to the performance of candidate search and selection. The legal basis that legitimises the data processing is the performance of pre-contractual measures adopted at your request.
- c. To verify, including through specialist companies, that the Data provided is accurate by referring to public information (including professional social network profiles, databases, online registers or publicly accessible multimedia archives). The processing, in accordance with the provisions of the Article 29 Working Group "Opinion on data processing at work", is limited only to information associated with professional attitudes at work, which is necessary for the sole purpose of evaluating the specific risks linked to the type of activity that must be performed by the candidates, carried out to the least intrusive extent possible, implementing every necessary measure to ensure a correct balance between the legitimate interest of the employer in performing checks and the rights and fundamental freedoms of the latter. The legal basis that legitimises the processing is legitimate interest, pursuant to Art. 6, paragraph 1 letter b) GDPR.
- d. To store the Data for 24 months for any future selections, in the event that the selection process you applied for had a negative outcome. The legal basis that legitimises the processing is the performance of pre-contractual measures adopted at your request, pursuant to Art. 6, paragraph 1 letter b) GDPR.
- e. To fulfil the obligations and exercise the rights of the Controller or data subject as provided for under applicable law on employment, social security and social protection, or under collective contracts, as well as to comply with provisions established by the legally empowered authorities and supervisory and control bodies. The legal basis that legitimises the processing is the need to fulfil the Data Controller's legal obligations with regard to "sensitive" data, as set out under Article 9 paragraph 2 letter b) GDPR.

2. SUPPLY OF THE DATA AND CONSEQUENCES OF ANY REFUSAL

Supply of the data is mandatory for personnel search and selection. Refusal to provide the Data prevents performance of this activity and will prevent your application from being taken into consideration.

3. RIGHTS OF THE DATA SUBJECT – COMPLAINTS TO THE DATA PROTECTION AUTHORITY

By sending an email to [amministrazione.personale@metro.it](mailto:amministrazione.personale@metro.it), data subjects can ask the Data Controller for access to Data pertaining to them, for it to be corrected, supplemented or removed. They can also ask for processing to

be limited in the cases established under Article 18 of the GDPR and they can object to processing, for reasons related to their own particular circumstances, where the Data Controller has a legitimate interest.

Furthermore, where processing is based on consent or contract and it is performed using automated instruments, data subjects have the right to receive the Data in a structured format, in common use and legible using an automatic device, and, if technically possible, to send it to another data controller without impediments. Data subjects have the right to withdraw their consent at any time and to object to the processing performed to pursue the Data Controller's legitimate interest. Data subjects also have the right to submit complaints to the competent Data Protection Authority.

#### 4. DATA STORAGE PERIOD

Data collected for the purposes cited under Clause 1 of this notice shall be stored for 24 months starting from the end of the selection process, pursuant to Article 5, paragraph 1, letter e) GDPR.

#### 5. RECIPIENTS

The Data may be shared with parties operating as autonomous data controllers or processed, on behalf of the Company, by parties designated as data processing contractors, which the Data Controller uses for the purposes of selection, recruitment and assessment of the candidates, and said parties are given suitable operational instructions.

For purposes connected to or essential to the performance of candidate search and selection, Data may be shared with other companies, as autonomous data controllers, belonging to the same group as the Company.

The data supplied will be stored on a server located in Frankfurt, Germany. The personal data will also be sent to support teams located in Europe, the United States and Asia. This processing is necessary to pursue our legitimate interests of granting support and is legally based on Art. 6 paragraph 1 sentence 1 letter f) GDPR. Transfer of the data to Asia and the United States is based on appropriate safeguarding measures (for e.g. standard contractual clauses). Any participation in online video interviews will take place through instruments provided by third parties whose servers are located in Amsterdam, Netherlands. Regarding all other personal data, which is collected, processed and stored in connection with such a video interview, you will be informed prior to conducting the interview within the platform and your explicit consent will be requested. This processing is legally based on Art. 6 paragraph 1 sentence 1 letter a) GDPR."

The Data may be transferred abroad to countries outside Europe where the level of data protection has been deemed adequate by the European Commission under Article 45 of the GDPR or subject to agreement of the Standard Contractual Clauses adopted/approved by the European Commission pursuant to Article 46, 2, letters c) and d).

The personal data collected will not be sent to any other recipient unless there is a legal obligation to do so.

#### 6. PARTIES AUTHORISED TO PROCESS DATA

The Data may be processed by employees in the company departments assigned to pursue the purposes cited above, who have been expressly authorised to process it and have received appropriate operational instructions.

#### 7. COOKIES

Browsing this website entails the use of cookies and session cookies, which are small text files sent to the user's browser and stored on the user's computer to ensure and improve the functionalities of the website.

Cookies and session cookies are used to enable search and registration operations, for example by registering the user's location and login data. The aforementioned cookies can also provide information about the device and the type of browser in order to assist visualisation of the website contents.

Session cookies will be automatically deleted after the browser page has been closed. The other types of cookie will be stored until their expiry or until the user deletes them. It is possible to see and delete the cookies from within your browser at any time by accessing the settings and/or options offered by the same.

The legal basis for processing data through cookies is the performance of the service, pursuant to Art. 6, paragraph 1 letter f) GDPR.

#### 8. NAVIGABILITY

Data on navigation of the website is anonymised and collected in order to monitor visits to the website. The data recorded may include the user's IP address, the operating system of the device used to access the website, the referring website, websites visited or the key words used to search for the website. The data is always anonymised before it is used.

These procedures are performed for statistical and security purposes. They are necessary to pursue the Data Controller's legitimate interest and to improve and guarantee the services offered, pursuant to Art. 6, paragraph 1 letter f) GDPR).

#### 9. DATA CONTROLLER

The Data Controller for personal data is:

- METRO Italia Cash and Carry SpA, with head office in San Donato Milanese (Milan), Via XXV Aprile 25, 20097 San Donato Milanese (Milan), telephone 02/51711, email [amministrazione.personale@metro.it](mailto:amministrazione.personale@metro.it).

#### 10. DATA PROTECTION OFFICER (DPO)

The Data Protection Officer for METRO Italia Cash and Carry SpA can be contacted at the following email address [dpo@metro.it](mailto:dpo@metro.it) or by sending a recorded delivery letter with advice of receipt to METRO Italia Cash and Carry S.p.a. – Via XXV Aprile, 25 – 20097 San Donato Milanese (Milan).

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