



Un'esperienza sulla quale trasportare

PERSONNEL PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA

We inform you that, for the purpose of establishing and properly managing an employment or collaboration relationship, our organization will collect and process personal data in accordance with applicable privacy laws (EU Regulation 679/2016 and Legislative Decree 196/2003).

1. Data Controller

The Data Controller is **A.D.R. S.p.A.**, with registered office at Via Pier Paolo Pasolini n.74, 20151 Milan (MI), Italy, VAT/Tax Code: 00637410127.

Privacy contact: adr-privacy1@adraxles.com

2. Processing and Nature of Data Collected

For the establishment, execution, and management of the employment/collaboration relationship, including administrative, accounting, tax, social security, training, health, and safety obligations, the following personal data may be processed:

Common data:

- Personal and contact information (e.g., email address)
- Accounting, fiscal, contractual, and financial data (e.g., bank details, salary)
- Contractual and behavioral data (e.g., job role)
- Multimedia data (e.g., photos, videos)
- Training and education history
- Family data and dependents (e.g., for tax deductions)
- Any other data necessary for contract fulfillment

Special categories of data (Art. 9 GDPR):

- Union membership, health-related data for benefits, or other data processed only as required by law.

Data are collected at the beginning of the employment relationship, during its course, and sometimes after its termination. When legally required, data may also include family members or cohabitants. Data will be processed with adequate safeguards to ensure confidentiality.

3. Purpose and Legal Basis of Processing

1. Recruitment management, including CV evaluation, selection, and establishment of the employment relationship.
Legal basis: Contractual obligations or pre-contractual measures (Art. 6(1)(b) GDPR).
2. Employment management, organization, and execution of work activities, including physical and IT access to company premises and systems.
Legal basis: Contractual obligations or pre-contractual measures (Art. 6(1)(b) GDPR).
3. Administrative and accounting management of the employment relationship in compliance with laws, collective agreements, and individual contracts.
Legal basis: Legal obligation (Art. 6(1)(c) GDPR).
4. Compliance with health, safety, anti-corruption, anti-mafia, and other legal obligations (e.g., D.Lgs. 81/2008, D.Lgs. 231/2001).
Legal basis: Legal obligation (Art. 6(1)(c) GDPR).
5. Protection of company assets and security, including IT system monitoring and video surveillance.
Legal basis: Legitimate interest (Art. 6(1)(f) GDPR).
6. Extraordinary health measures (e.g., temperature checks, Green Pass).
Legal basis: Legal obligation (Art. 6(1)(c) GDPR).

Special categories of data: Art. 9(2)(b) GDPR – necessary to fulfill labor law or social security obligations with appropriate safeguards.

4. Recipients and Data Sharing

Personal data are not publicly disclosed. When necessary for work assignments, only basic personal data (name, surname, role) and contact details may be shared with:

- Public authorities for labor, tax, social security, and safety compliance
- Company-appointed medical personnel
- Trade unions as required by collective agreements
- Pension or welfare funds
- External service providers (IT, administrative, health, technical, or consultancy services)
- Banks and financial institutions
- Any other recipients strictly related to the performance of job duties

5. Transfers Outside the EU

No transfers outside the European Union are planned.

6. Data Retention

Data will be retained for the duration necessary to achieve the purposes described above, and after termination, until the end of statutory retention periods or resolution of legal matters. Specific retention periods:

- CVs for recruitment: 1 year after selection process
- Video surveillance: max 24 hours (up to 48 hours on weekends)
- IT system access logs: 6 months

Retention may be extended in case of legal proceedings or security incidents.

7. Data Subject Rights

Under GDPR (Articles 12-22), personnel have the right to access, correct, delete, limit processing, object to processing, and request data portability. Consent-based processing may be revoked at any time without affecting the lawfulness of prior processing. Contact **adr-privacy@adraxles.com**

to exercise your rights. Complaints may be filed with the data protection authority.

8. Obligation or Voluntariness of Data Provision

Providing personal data is necessary for the establishment, continuation, or proper execution of the employment relationship. Failure to provide data may prevent full or partial fulfillment of legal or contractual obligations.

9. Automated Decision-Making

No automated decision-making or profiling is performed (Art. 22 GDPR).

10. Processing Methods

Data will be processed using appropriate IT and organizational measures to ensure confidentiality and security. Data may be processed directly by the company or via authorized external collaborators acting as Data Processors. An updated list of Data Processors is available on request.

A.D.R. S.p.A.
Legal Representative
Flavio Radrizzani