



CANDIDATE PRIVACY DISCLOSURE

(Pursuant to articles 13-14 of the General Data Protection Regulation 2016/679)

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 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 'GDPR' or the 'Regulation'), we inform you that personal data (hereinafter also referred to as 'Data') will be subject to processing activities as defined in Article 4 of the GDPR, in compliance with the aforementioned legislation and in accordance with the confidentiality obligations that guide the activities of BFF Bank S.p.A.

We inform all data subjects about the following:

1 Data Controller

The Data Controller is **BFF Bank S.p.A.** (hereinafter "the **Bank**" or "**Data Controller**"), with registered office in Viale Lodovico Scarampo 15, 20148 Milan, Italy.

2 Categories of personal data processed

Personal data concerning the Candidate include personal identification details, contact information, personal photographs, language skills, and data related to previous educational and professional experiences. Such data shall be collected through electronic platforms dedicated to Recruitment or obtained from documents forwarded to the Data Controller (e.g., the resume) by the Candidate or by third parties involved in human resources recruiting.

Additionally, the Candidate may be asked to undertake a psycho-aptitude assessment proposed by the Bank to improve the evaluation of the Candidate's professional profile. In such cases, the Bank will collect and process the responses provided during the tests, along with the results obtained from the assessment.

The Candidate may be asked to provide professional references during the recruitment process, (including personal identification details, contact information, and data related to the job position), which will be processed on the assumption that the Candidate has had the express permission from the individuals concerned to share their Data with the Bank.

3 Purpose and legal basis of Processing

The Data will be processed by BFF Bank S.p.A. for the following purposes:

- a) Recruitment and personnel selection;
- b) Scheduling of activities;

- c) Internal control services through electronic processing of professional profiles, consultation, and comparison;
- d) Potential contact with the professional references provided by the Candidate to verify the Candidate's previous work and professional experiences;
- e) Potential processing of the responses to the tests and the results obtained from the proposed psycho-aptitude assessments for the evaluation of the Candidate's professional profile.

Pursuant to Article 6, paragraph 1, letter b) of the GDPR, the legal basis for purposes a), b), and c) is the execution of pre-contractual measures to assess the Candidate's professional skills for recruitment within the Bank's organizational structure.

The purposes d) and e) are pursued without prejudice to the interests, rights, and fundamental freedoms of the data subjects, based on the legitimate interest of the Data Controller pursuant to Article 6, paragraph 1, letter f) of the GDPR.

4 Methods of Processing and Provision of Data

The Data will be processed by authorized personnel pursuant to Article 29 of the GDPR. Additionally, the Data may be processed by third parties acting as Data Processors pursuant to Article 28 of the GDPR, which provide specific processing services or complementary activities. The processing operations will be carried out according to pre-established standard criteria and will include all appropriate measures necessary to achieve the intended purposes. Depending on the channel used by the Candidate to interact with the Bank, the methods of processing personal data may include phone calls, emails, or postal correspondence.

The provision of the requested Data is not mandatory, however, withholding such data will not allow the Bank to carry out the controls required by the current internal procedures and, consequently, will result in the inability of carrying out the activities deemed necessary for the purposes of personnel selection.

5 Categories of Recipients of Personal Data

The Data, or any part of them, will be shared with the following parties who shall perform certain processing operations on behalf of the Data Controller for this purpose:

- other companies within the BFF Banking Group;
- providers appointed, when necessary, as data processors or qualified as autonomous data controllers.

6 Data transfer to third countries

The Data Controller may utilize services offered by certain providers, duly qualified as Data Processors, operating in Europe or in countries for which adequacy decisions have been issued by the European Commission and/or the Data Protection Authority.

In case of data transfer to countries outside the European Union territory, it will be assessed on a case-by-case basis to determine whether the level of data protection and the related security measures are adequate and effective, prior to any transfer and considering the circumstances.

7 Data Retention Period

If the selection process should not be successful, the personal data provided by the Candidate will be retained for a limited period, not exceeding the calendar year following their collection, and will subsequently be deleted.

8 Data subject rights and information about the Data Protection Officer

With regard to the processing of the aforementioned Data, according to Articles 15 et seq. of the GDPR, the data subject has the right to obtain, without delay from the Data Controller, confirmation as to whether or not personal data concerning them is being processed and, if so, to obtain access to the personal data and the following information: (a) the purposes of the processing; (b) the categories of personal data in question; (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular whether the recipients are in non-EU countries or international organizations; (d) if possible, the period for which the personal data are to be retained or, if this is not possible, the criteria used to determine that period e) the existence of the data subject's right to request from the controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning them or to object to their processing; f) the right to lodge a complaint with a supervisory authority if the data subject considers that the rights referred to herein have not been granted to them; g) if the Data are not collected from the data subject, all available information about their origin; h) the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic used, as well as the importance and the expected consequences of such processing for the data subject. The data subject also has the right to request the portability of their data and to withdraw their consent - where given - at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

To exercise the above rights, the data subject may contact the Data Controller **BFF Bank S.p.A.**, Viale Lodovico Scarampo 20148, Milan, Italy. The Bank has appointed a Data Protection Officer (DPO) who can be reached at the following email address: DPO@bff.com.