

RECRUITMENT PRIVACY NOTICE

INFORMATION NOTICE IN RESPONSE TO CURRICULA RECEIVED FOR THE SELECTION OF PERSONNEL IN ACCORDANCE WITH ART. 13 OF EU REGULATION 679/2016

Overview

When you are applying for a job position with us through an application form or through our portal/platform known as “**KedPeople**” (which is our cloud-based human resources software suite developed by SAP) or are having an interview with us, you would be providing personal data to the Kedrion Group Companies.

The Kedrion Group Companies are all the legal entities included here: <https://www.kedrion.it/struttura-societaria/>.

While you may be applying for a job position or having an interview with only one entity within the Kedrion Group Companies, we streamline some of our operations and therefore your personal data will be shared with other entities within the Kedrion Group Companies.

While each entity within the Kedrion Group Companies is a “**Data Controller**”, when the Kedrion Group Companies are collecting personal data for recruitment purposes, the Kedrion Group Companies are considered to be operating as “**Joint Controllers**” pursuant to Article 26 of the EU GDPR.

Joint Controllers refer to two or more entities that, together, determine the purposes and means of processing personal data. This means that these entities share responsibility for ensuring that the personal data is processed in compliance with data protection laws.

1. Our approach to compliance

We want to ensure that you fully understand how each Data Controller handles your personal data. Our commitment to your privacy is clear, and we take all necessary steps to protect your data from any potential risks or breaches.

Each Data Controller prioritises the confidentiality and security of your personal data. We have implemented robust policies, procedures, and technical measures to ensure that your personal data is collected, used, and stored safely and in compliance with relevant data protection laws.

In addition, we fully recognise and respect your rights regarding your personal data. This includes your right to be informed about how your data is used, your right to access your data, and your right to request the deletion (erasure) of your data when appropriate.

We take data protection seriously and are committed to maintaining compliance with data protection regulations. As part of this commitment, we continuously review and update our data protection

practices, especially when there are legal, regulatory, or organisational changes that may impact how we process your personal data.

2. Personal data that will be processed

Kedrion S.p.A is responsible for overseeing all of the Data Controllers within the Kedrion Group Companies. This means that it will oversee the collection of your personal data during the recruitment process.

This personal data may include, in particular by way of example, the credentials of your personal account, your name, contact details, areas of professional interest, employment status, any membership of "protected categories", information relating to your professional expectations, your educational background, your skills and experiences, your Curriculum Vitae ("**CV**"), any additional information that you wish to provide us during our interaction, as well as any additional data that we may acquire, including from third parties, during the recruitment process. This may include information in respect of any criminal convictions, employment relationships with government agencies and authorities and/or family ties with government officials or with politically exposed persons and information relating to the existence of any conflicts of interest.

Kedrion S.p.A will ensure that the Data Controller with whom you have applied for a job position – processes your personal data correctly when evaluating your application. It will also be responsible for overseeing if you wish to apply for a role with another Data Controller within the Kedrion Group Companies – and if this is the case, your personal data will be transferred to that Data Controller. When Kedrion S.p.A is overseeing all of the Data Controllers within the Kedrion Group Companies, it is operating as a Joint Controller at the same time.

3. Purpose of processing and related lawful bases

The personal data concerning you will be processed for the following purposes:

- (a) by the various Joint Controllers to carry out the activity of research, selection and evaluation of candidates for potential job opportunities (and this is based on our need to take certain steps before possibly entering into a contractual agreement with you);
- (b) by the various Joint Controllers to fulfill legal obligations, regulations, and/or international laws (which is based on our need to comply with statutory requirements); and
- (c) by the various Joint Controllers to exercise their rights in court and to implement the Kedrion Group Code of Conduct (which is based on our legitimate business interests).

In respect of criminal convictions data, we will process such information only to the extent permitted by applicable national laws and in order to comply with the Kedrion Group Code of Conduct.

4. If you fail to provide personal data that is being requested

If you choose not to provide certain personal data necessary for the recruitment process, we may be unable to properly assess your application or proceed with it. Some information is essential to evaluate your qualifications and to take steps before potentially entering into an employment contract with you. While you are not required to provide all requested details, missing information may limit our ability to consider your application fully.

5. Data processing methods

We collect your personal data when you apply to us through filling in an application form or directly applying through KedPeople. KedPeople operates with the support of Artificial Intelligence (“AI”). AI refers to technology that enables machines to analyse data, recognise patterns and make automated decisions or recommendations. While we may use AI to assist in certain aspects of the recruitment process such as screening applications or identifying potential matches, KedPeople does not make final decisions on its own. There is always human oversight and intervention to ensure fairness, accuracy and a thorough evaluation of each candidate.

When you provide us with your personal data, it will be shared between the Joint Controllers and accessed by relevant personnel within the Kedrion Group Companies. This includes human resources teams, hiring managers, administrative staff, information technology support and other employees involved in the recruitment process. Access is granted only to those who need the information to perform their job duties and support your potential hiring.

6. International personal data transfers

As part of our global operations, we will transfer your personal data within the Kedrion Group Companies which act as Joint Controllers of your personal data.

The Kedrion Group Companies are located in the European Union (“EU”), the United Kingdom (“UK”) and other countries worldwide. It is necessary for us to share personal data within the Kedrion Group Companies to facilitate recruitment processes, administrative and accounting purposes and to perform other legitimate business operations.

Given that some of the Data Controllers are based in countries that may not offer the same level of protection as the EU and UK, we implement appropriate safeguard to ensure that your personal data remains secure. These include:

- (a) The use of EU Standard Contractual Clauses (“SCCs”) approved by the European Commission for personal data transfers outside the EU.

- (b) The implementation of the UK International Data Transfer Agreement (“**IDTA**”) for personal data transfers from the UK. Where personal data is being transferred outside of the EU and UK, we implement the SCCs and the UK International Data Transfer Addendum.
- (c) Transferring personal data only to countries that the European Commission or UK authorities have deemed to provide an adequate level of data protection.
- (d) Applying additional technical, organisational and contractual measures to ensure compliance with the EU GDPR, UK GDPR and all other applicable data protection laws.

We have a data sharing agreement in place between Data Controllers to ensure that all personal data shared within the Kedrion Group Companies is processed in compliance with applicable data protection laws. Our data sharing agreement also states when the parties are operating as Joint Controllers.

7. Sharing personal data with third parties

In addition to internal transfers within the Kedrion Group Companies, we may also share your personal data with third parties including those located in third countries (so outside of the EU and UK), under the following circumstances:

- (a) Public authorities and regulatory bodies – Your personal data may be shared with government authorities, law enforcement agencies, courts and other regulatory bodies where required by law or to comply with legal obligations.
- (b) Supervisory and compliance bodies – The board of the Data Controller may access your personal data as part of its compliance and regulatory oversight functions.
- (c) Service providers – We may share your personal data with external consultants, legal advisors, information technology and cloud service providers and other professional service providers who support our recruitment, business operations and technical infrastructure.
- (d) Corporate transactions – In the event of a merger, acquisition, or sale of company assets, your data may be transferred to relevant third parties involved in the transaction, subject to appropriate confidentiality and data protection agreements.

All third parties receiving your personal data are required to process it strictly in accordance with applicable data protection laws and only for the purposes specified in this privacy notice. We ensure that international transfers to third parties outside the EU and UK are carried out using legally recognised mechanisms, such as SCCs, IDTAs or other appropriate safeguards.

In some cases, if the above safeguards mentioned in section 7 are not in place *or* we wish to ensure that you are even more informed of the international personal data transfer, we may (additionally) ask for your explicit consent for the transfer of your personal data to countries that do not offer an equivalent level of data protection to that provided within the EU and UK.

8. Provision of consent

If you have reviewed and understood the information provided in this recruitment privacy notice, and if the Data Controller handling your application is based in a non-EU or the UK (as highlighted here: <https://www.kedrion.it/struttura-societaria/>), you will be asked to give your consent for (a) the processing of your personal data; and (b) the transfer of your personal data to the non-EU country (or one outside of the UK) where the relevant Joint Controller is located. Please note that this country may not offer the same level of data protection or legal recourse for data breaches as is provided within the EU and UK.

9. Data subject rights

Under applicable data protection laws, you have several rights regarding your personal data. These include:

- The right to access your personal data;
- The right to correct or update your personal data;
- The right to delete your personal data;
- The right to withdraw your consent;
- The right to limit how your personal data is being processed;
- The right to object to how your personal data is being processed; and
- The right to transfer your data (data portability).

You can exercise these rights easily, without any special formalities or charges.

The rights regarding deceased persons, pursuant to art. 2 terdecies of the Privacy Code as amended by Legislative Decree 101/2018, may be exercised by anyone who has a personal interest or acts to protect the interested party as his agent or for family reasons worthy of protection.

For any further information and, in any case, to send your request, you can contact the address privacy@kedrion.com.

10. Data retention

We will retain your personal data for as long as necessary to fulfill the purposes for which it was collected, namely for recruitment and hiring. If you are not selected for the position you applied for, your personal data will only be retained for as long as necessary or if you agree for it to be retained for longer in order for us to consider you for future opportunities. If you are hired, your personal data will be retained in accordance with our record retention practices which are aligned with applicable laws. In all cases, we ensure that your personal data is securely stored and disposed of when it is no longer required.

11. Making official complaints

Without prejudice to any other administrative or judicial action, you may submit a complaint in accordance with the procedures set forth in EU Regulation 679/2016 and the Privacy Code as amended by Legislative Decree 101/2018. However, before you make a complaint, we would appreciate the opportunity to first address any issues or concerns that you have in respect to how we are processing your personal data.

12. Contacting us

While each Data Controller has a designated Data Protection Officer (“DPO”) in place, the Kedrion Group Companies has also appointed a specific DPO for you to contact when the Data Controllers within the Kedrion Group Companies are operating as Joint Controllers – namely in respect of recruitment. For general queries, the DPO representing all of the Joint Controllers can be contacted by writing to the following email address: privacy@kedrion.com.

Furthermore, Kedrion S.p.A has appointed a DPO who you can contact for with any queries regarding your specific rights under data protection laws. The contact details of this DPO are as follows: DPO@kedrion.com.