

Privacy Notice for Spontaneous CV Submission (Notice pursuant to Art. 13 of Regulation (EU) 2016/679 - GDPR)

This document contains information regarding the management of data within curricula (CVs) submitted spontaneously by individuals proposing their candidacy for a potential collaboration with **MODULBLOK S.p.A.** (hereinafter "**MODULBLOK**").

This notice is provided in accordance with **Legislative Decree no. 196/2003** (as amended by Legislative Decree 101/2018 - Personal Data Protection Code) and **Articles 13 and 14 of EU Regulation 2016/679 (GDPR)**. This notice applies to all methods of data transmission (including, but not limited to, mail, website forms, or email attachments) for any CV received.

1. Data Controller

- **Company Name:** Modulblok S.p.A.
- **VAT Number:** IT00812590305
- **Registered Office:** Via Vanelis, 6 Pagnacco (UD) 33010
- **Operational Headquarters:** Via Candoni, 5 Amaro (UD) 33020
- **Telephone:** 0432-991711
- **Email:** info@modulblok.it
- **Certified Email (PEC):** pec.modulblok@pec.modulblok.it

2. Data Processing

Data Provided by the User

The Controller processes all data contained in the CVs received. Since the specific content of submitted CVs cannot be known in advance, the Controller may potentially process **special categories of data** (Art. 9 GDPR) — such as racial/ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, or health and sexual orientation — as well as data relating to **criminal convictions and offences** (Art. 10 GDPR).

Legal Basis

The legal basis for processing is defined under **Art. 6, paragraph 1, letter a) GDPR**. Consent for the processing of data provided spontaneously and voluntarily is considered **clearly and unequivocally expressed** by the act of sending the CV itself (pursuant to Art. 4, point 11), regardless of whether written consent is explicitly included within the document. Consent may be revoked at any time by contacting the addresses listed above.

Purpose of Processing

Received data will be used exclusively to evaluate the suitability of candidates for a potential collaboration with MODULBLOK.

Duration of Processing

Data is stored for the time strictly necessary to perform professional suitability checks and, in any case, for a period **not exceeding 6 months**. CVs will be securely destroyed after 6 months if the profile does not meet MODULBLOK's needs. If a candidate is selected for an interview, the CV is kept until that

time and subsequently destroyed regardless of whether a collaboration is established.

Authorized Personnel

Data may be processed by partners, collaborators, and employees of MODULBLOK who are duly authorized. A list of authorized personnel is available at the company headquarters.

Transfer and Communication

Data will not be communicated, disseminated, or transferred to countries outside the European Union.

3. Rights of the Data Subject

Pursuant to **Articles 15 to 23 of the GDPR**, the data subject has the right to:

- **a. Access [Art. 15]:** Be informed about the processing of their data and receive a copy.
- **b. Rectification [Art. 16]:** Correct inaccurate personal data.
- **c. Erasure ("Right to be forgotten") [Art. 17]:** Request the deletion of their data.
- **d. Restriction of Processing [Art. 18]:** Limit processing in cases of unlawful use or contested accuracy.
- **e. Portability [Art. 20]:** Receive data in a structured format to transmit to another controller.
- **f. Objection [Art. 21]:** Object to the processing of personal data.
- **g. Automated Decision-making [Art. 22]:** Right not to be subject to decisions based solely on automated processing.

How to exercise your rights:

Requests should be sent to the Data Controller at **pec.modulblok@pec.modulblok.it** using the official forms provided by the Data Protection Authority, available on our website or at www.garanteprivacy.it.

Data subjects also have the right to **withdraw consent** at any time and the right to **lodge a complaint** with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*).

4. Data Security

Data is processed lawfully and correctly. MODULBLOK adopts appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of data. Processing is carried out using organizational methods and logic strictly related to the stated purposes.