

## DATA SUBJECT'S INFORMATION FOR CANDIDATES

With this information, which is also delivered in paper format, pursuant to and for the purposes of art. 13 of the EU Regulation n. 2016/679 (here in after "GDPR") and for the purposes of the Law on the implementation of the General Regulation on data protection and other applicable laws in the Republic of Croatia, concerning the protection of the processing of personal data of natural and legal persons, the undersigned Company, Eidos doo (OIB 38310184682) based in Pomerio street 29<sup>th</sup>, 51000 Rijeka (Hrvatska), informs you that:

1. the aforementioned law provides for a series of obligations for those who perform "treatments" (such as, but not limited to, collection, recording, processing, storage, communication, dissemination, etc.) of personal data referred to other subjects;
2. the processing of personal data concerning you, which will be requested or that will be communicated by you or by third parties, will be carried out by the company Eidos doo, the Data Controller, according to the principles of correctness, lawfulness and transparency and protection of your privacy and our right, in fulfillment of legal and contractual obligations or, in any case, in pursuing the legitimate interests of the Company in accordance with the provisions of paragraph 1.f of the article 6 of the GDPR.
3. The data will be processed with the support of paper, computerized or telematic means. If the processing and transmission of the aforementioned data should take place through automated methods, this will be done by means of suitable instruments, with regards to the present state of technology, to guarantee security and confidentiality through the use of suitable procedures to avoid the risk of loss and unauthorized access, illicit use and dissemination.

The processing will take place with logic strictly related to the purposes stated on the basis of data in our possession and with commitment on its part to promptly notify us of any corrections, additions and / or updates.

4. In particular, the processing of your personal, identifying and curricular data, as well as any particular, provided by you and collected by the persons appointed by the Company and referred to by the Data Controller for the selection procedures, will be carried out for the purpose of:
  - a. inclusion in the "candidates" database;
  - b. use and management for purposes connected or related to the research and selection of candidates.

In particular:

- for the verification of the existence of the conditions for a possible recruitment and / or for the start of a collaboration

and therefore for the assessment of the suitability to hold a job position within the Company and the selection of a profile of possible interest, or to propose any other job opportunities consistent with your professional profile.

5. The data will not be disclosed or communicated to parties external to the structure of the Data Controller, with the exception of third parties identified and appointed pursuant to art. 29 of the GDPR if necessary for the purposes indicated in paragraph 4 and identified specifically in paragraph 14.

6. The contribution of data is optional and is left to the candidate's wish to present his curriculum vitae. Regarding the data subsequently and eventually requested by the Data Controller, any refusal to supply them in whole or in part may give rise to the impossibility of the company Eidos d.o.o. to evaluate and select your application and, therefore, to proceed with the verification of the conditions for the recruitment and / or start of the collaboration.
7. In the hypothesis in which the procedure in question has been activated with the spontaneous sending of the curriculum, the processing of personal data will be lawful and permitted even in the absence of its consent, because it is aimed at the execution of pre-contractual measures (the evaluation of the candidacy and the selection of candidates) taken on your explicit request.
8. We invite you not to indicate in your curriculum vitae particular data, relating in particular to the state of health, religious convictions or political opinions. Any sensitive data, in the absence of a specific written declaration of consent, will be deleted and will not be taken into account in the evaluation of the application.
9. We exclude the hypothesis in which the aforementioned data must be known by reason of the establishment of a working relationship, with particular reference to the possible belonging to the protected categories and to any pre-employment medical examinations, and exclusively in relation to the facilitations could take advantage. In the latter case the interested party is invited to express explicit written consent to the processing of data.
10. We also ask you not to provide judicial data, or data that are suitable to reveal provisions regarding criminal records, records of administrative penalties depending on crime and the related pending charges, or the characteristics of defendant or suspect under the legislation applicable penalty.
11. The data collected will be stored and processed for the period necessary to achieve the purposes related to the research and selection of personnel and, subject to your specific written consent, even after the conclusion of the above activities, for the execution of which you have sent or will send the curriculum vitae, for the only purpose of using the data collected for further selection activities if, in the future, your professional profile should present characteristics of particular interest to the Company.
12. In any case, the data will be kept until no longer than three years from their collection, except for the possible establishment of a working and / or collaboration relationship.
13. The law, as an "interested party", assures you, among others, the following rights:
  - know the existence or not of personal data concerning you and their communication in an intelligible form;
  - be informed on the Data Collector, on the purposes and methods of the data processing and on the possible responsible, on the subjects or categories of subjects to whom the personal data can be communicated;
  - obtain the updating, rectification or integration of data;
  - obtain the cancellation, the transformation in anonymous form or the block of the same;
  - oppose the processing of data for legitimate reasons, within the limits established by law;
  - oppose the sending of advertising material or for carrying out market research or commercial communication;
  - make any complaint to a supervisory authority.
14. In accordance with the foregoing
  - the Data Collector is Eidos d.o.o., with headquarters at Pomerio n. 29, 51000 Rijeka (Hrvatska), legally represented by Egisto Bressan; the communications to this Company

concerning the processing of your personal data, must be sent to the e-mail address [privacy@eidos.hr](mailto:privacy@eidos.hr).

The aforementioned data will be communicated for the purposes of paragraph 4 to the Company Nikes Srl (Via Caboto 19/1- 34147 Trieste - Italy VAT number 00774220321), as External Data Processing Manager, which provides Eidos d.o.o. the necessary services in support of personnel management, including research and the maintenance of curricular and personal data.

The duration of data processing, in any case also subject to legal obligations, will coincide with that of the contractual relationships between Eidos d.o.o. and Nikes Srl.

15. It should be noted that, in accordance with the GDPR, the Company is preparing a privacy organizational model, identifying roles and responsibilities regarding the processing of personal data, identifying, in particular, as internal privacy contacts, the Heads of Organizational Units or Offices that, limited to their own competence, they are responsible for the execution of the data protection model in compliance with the applicable regulatory requirements.

The Data Collector has designated in writing the persons who are in charge of the data processing, according to the applicable law; they are the employees of the company that work in the functions appointed to pursue the aforementioned purposes and to provide him with adequate instructions.

The complete and updated list of data processors is knowable on request at the Company's headquarters or by sending an e-mail to the following e-mail address: [privacy@eidos.hr](mailto:privacy@eidos.hr).

We invite you to read the articles 13, 14 and 15 of the GDPR - relating to the "Right of access to personal data and other rights" of the interested party - reported at the bottom and, therefore, to subscribe the present for acknowledgment.

Date \_\_\_\_\_

Signature \_\_\_\_\_

#### **THE EU GENERAL DATA PROTECTION REGULATION 2016/679 (GDPR)**

##### *ARTICLE 13 Information to be provided where personal data are collected from the data subject*

*1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:*

- a) the identity and the contact details of the controller and, where applicable, of the controller's representative;*
- b) the contact details of the data protection officer, where applicable;*
- c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;*
- d) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;*
- e) the recipients or categories of recipients of the personal data, if any;*
- f) where applicable, the fact that the controller intends to transfer personal data to a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.*

*2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:*

- a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;*

- b) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
  - c) where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
  - d) the right to lodge a complaint with a supervisory authority;
  - e) whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
  - f) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
3. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.
4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information.

**ARTICLE 14 Information to be provided where personal data have not been obtained from the data subject**

1. Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:
- a) the identity and the contact details of the controller and, where applicable, of the controller's representative;
  - b) the contact details of the data protection officer, where applicable;
  - c) the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
  - d) the categories of personal data concerned;
  - e) the recipients or categories of recipients of the personal data, if any;
  - f) where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organization and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.
2. In addition to the information referred to in paragraph 1, the controller shall provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject:
- a) the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
  - b) where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
  - c) the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
  - d) where processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
  - e) the right to lodge a complaint with a supervisory authority;
  - f) from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
  - g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
3. The controller shall provide the information referred to in paragraphs 1 and 2:
- a) within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
  - b) if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
  - c) if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.
4. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.
5. Paragraphs 1 to 4 shall not apply where and insofar as:
- a) the data subject already has the information;
  - b) the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) or in so far as the obligation referred to in paragraph

1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;

c) obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or

d) where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.

#### ARTICLE 15 Right of access by the data subject:

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

#### Further references cited in the articles above

##### Mentioned articles or parts

###### ARTICLE 6 Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

....omissis....

f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

....omissis....

##### Mentioned observations

40) In order for processing to be lawful, personal data should be processed on the basis of the consent of the data subject concerned or some other legitimate basis, laid down by law, either in this Regulation or in other Union or Member State law as referred to in this Regulation, including the necessity for compliance with the legal obligation to which the controller is subject or the necessity for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

(C60) | The principles of fair and transparent processing require that the data subject be informed of the existence of the processing operation and its purposes. The controller should provide the data subject with any further information necessary to ensure fair and transparent processing taking into account the specific circumstances and context in which the personal data are processed. Furthermore, the data subject should be informed of the existence of profiling and the consequences of such profiling. Where the personal data are collected from the data subject, the data subject should also be informed whether he or she is obliged to provide the personal data and of the consequences, where he or she

does not provide such data. That information may be provided in combination with standardized icons in order to give in an easily visible, intelligible and clearly legible manner, a meaningful overview of the intended processing. Where the icons are presented electronically, they should be machine-readable.

(C61) The information in relation to the processing of personal data relating to the data subject should be given to him or her at the time of collection from the data subject, or, where the personal data are obtained from another source, within a reasonable period, depending on the circumstances of the case. Where personal data can be legitimately disclosed to another recipient, the data subject should be informed when the personal data are first disclosed to the recipient. Where the controller intends to process the personal data for a purpose other than that for which they were collected, the controller should provide the data subject prior to that further processing with information on that other purpose and other necessary information. Where the origin of the personal data cannot be provided to the data subject because various sources have been used, general information should be provided.

(C62) However, it is not necessary to impose the obligation to provide information where the data subject already possesses the information, where the recording or disclosure of the personal data is expressly laid down by law or where the provision of information to the data subject proves to be impossible or would involve a disproportionate effort. The latter could in particular be the case where processing is carried out for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. In that regard, the number of data subjects, the age of the data and any appropriate safeguards adopted should be taken into consideration.

Date \_\_\_\_\_

Mr.

\_\_\_\_\_  
For acknowledgment of the information

Noting the aforementioned disclosure pursuant to the GDPR with reference to the processing of my particular data or, for example, relating to my state of health, religious beliefs or political opinions, for the treatments referred to paragraph 4 of the aforementioned disclosure, known the purposes and methods of processing the data requested to me and knowing that at any time I will be able to request the modification or - when possible - the cancellation

I agree

I don't agree

to the processing of my personal data in order of their addition and storage in the database of candidates for future research and selection activities.

Date \_\_\_\_\_

Signature \_\_\_\_\_