

### Complete privacy policy for job applicants

## Who are we and what do we do with your personal data?

The companies Valmet Engraving Solutions S.r.l., with its registered office in 55100 Lucca, Via Giovanni Diodati 50 and Valmet Oyj with registered office in Keilasatama 5 / PO Box 11 FI-02150 Espoo (Finland) (hereinafter also the "Joint Data Controllers"), as Joint Data Controllers care about the confidentiality of your personal data and ensuring that they are protected from any event that might put them at risk of being breached.

The essential content of the Joint Controllership Agreement concluded between the Joint Data Controllers is available upon request to be submitted to the address: ES.it.privacy@Valmet.com

The Contractors have appointed a responsible for data protection or data protection officer (DPO) whom you can contact if you have questions about their policies and practices. You can contact the DPO/DPO at the addresses and contact information below:

Valmet Engraving Solutions S.r.l.	dpo.engraving@valmet.com
Valmet Oyj	jussi.leppala@valmet.com

# How and why do the Contractors collect and process your personal information?

Joint Data Controllers collect and/or receive information about you, such as:

- first name, last name;
- date and place of birth;
- gender;
- fiscal code;
- pictures;
- e-mail;
- telephone number;
- address;

- data relating to health status if the person concerned belongs to protected categories.

Your personal data will be processed for the following purposes:

## 1) the selection of personnel and/or the start of a collaboration and the consequent fulfilments, including regulatory ones (the latter exclusively pending on Valmet Engraving Solutions S.r.l.)

Purpose	Legal basis	
- the search for candidates for open positions	Performance of pre-contractual activities	
- the collection of applications and resumes,		
which may take place through: recruitment ads	Fulfillment of specific obligations Performance of	
conveyed through recruitment agencies,	specific duties arising from laws, regulations or	
temporary agencies, universities, advertisement	collective agreements, including company	

Valmet Engraving Solutions S.r.l.

P.IVA - Cod. Fisc. – Iscr. Reg. Impr. n°: 13180700158 Capitale Sociale € 1.000.000,00 Valmet Group: Valmet Oyj, Keilasatama 5 / PO Box 11 02151 Espoo (Finland) Business ID 2553019-8

Società Unipersonale/Sole quotaholder company

Via Giovanni Diodati, 50, 55100, Lucca, Italy

PEC: valmetengraving@pec.it - info.ti.luc@valmet.com - www.valmet.com



<ul> <li>periodicals, institutional website</li> <li>the examination of the resumes received</li> <li>the organization of selective interviews</li> <li>the placement of the successful candidate in the company's organizational context</li> </ul>		agreements, in particular for the purpose of establishing the employment relationship and/or collaborative relationship		
- the	establishment	of	the	
employment/collaboration relationship				

Your data may also be collected from third parties such as, but not limited to:

- IT service providers;

- private entities that perform labor administration, intermediation, personnel search and selection, training and outplacement support activities;

- universities.

Where applicable, the right to rectification of data processed or collected is reserved.

The data collected or otherwise obtained by the Joint Data Controllers as a result of the establishment of the selection process for positions available within their organization, except for those related to your health status, which you voluntarily released, must be understood as necessary and failure to provide them means that the Contractors will be unable to follow up on the activities aimed at:

- evaluate your candidacy in the personnel selection process to which the Joint Data Controllers also follow up through their suppliers (third parties/recipients);

- Manage the candidate selection process in all its phases and the resulting fulfillments.

2) for the communication to third parties and recipients

Purpose	Legal basis
Communication to third parties, such as	Execution of pre-contractual activities
<ul> <li>IT consultants</li> <li>Companies of the group</li> <li>Emoployment agencies</li> <li>Pulic and private authorities</li> </ul>	Fulfilment of legal and/or regulatory obligations dependent on the activities put in place with the selective procedure (exclusively pending on Valmet Engraving Solutions S.r.l.)

Your personal data will not be in any way disseminated or disclosed to unspecified and unidentifiable subjects even as third parties.

Disclosure concerns the categories of data whose transmission is necessary for the performance of the activities and purposes pursued by the Contractors in the management of the selection procedure. The relevant processing does not require the consent of the data subject in the event that the same takes place in order to give effect to the obligations arising from the relationship established or in the event any other hypothesis of exclusion should occur (in particular the tracing of a legitimate interest by the Contitolari), expressly provided for or dependent on the rules and regulations applied by the Contitolari, or even through third parties identified as data processors. Where the communication involves data capable of revealing the state of health, the related processing operations will take place with all the



appropriate guarantees including those that, if required based on the risks detected, determine the application of pseudonymization solutions, and / or aggregation and / or encryption of data.

### How where and for how long is your data stored?

#### How

The data processing is performed through paper supports or IT procedures by specially authorized and trained internal subjects. Such internal subjects are allowed access to your personal data to the extent that it is necessary to carry out the processing activities that concern you. The data belonging to particular categories are treated separately from the others also by means of pseudonymisation or aggregation methods that do not allow you to be easily identified.

The Joint Data Controllers periodically verifies the tools through which your data is processed and the security measures provided for which it provides for constant updating; verifies, also through the subjects authorized to the treatment, that personal data of which the processing is not necessary is not collected, processed, filed or stored; verifies that the data is stored with the guarantee of integrity and authenticity and their use for the purposes of the treatments actually performed. The Joint Data Controllers guarantees that the data, even after the verifications, are found to be excessive or irrelevant will not be used except for the possible retention, according to the law, of the deed or document that contains them.

#### Where

Your personal data may also be processed outside the European Economic Area. In such circumstances, the Joint Data Controllers shall adopt all the data protection safeguards provided by the relevant legislation, and in particular the application of the standard contractual clauses approved by the European Commission; the application of the Data Privacy Framework between the European Union and the United States of America; and the application of adequacy decisions approved by the European Commission for those countries deemed adequate with respect to the protection of personal data.

#### For how long

We keep your personal data for as long as necessary to carry out the activities concerning you. In particular:

identifying data	Duration of the selection procedure
	This is without prejudice to:
health conditions data	- the limitation of processing and other guarantees
	provided for data belonging to special categories
	- The deletion of personal data collected through
	resumes sent spontaneously or in the absence of an
	open position;
	- the interest of the Joint Data Controllers to keep the
	data, even those released spontaneously by you, for the
	time necessary to evaluate the candidacy also for future
	work/collaboration relationships
	- The establishment of the employment/collaboration
	relationship.
	Subject to possible litigation if it involves an extension
	of the aforementioned terms, for the time necessary to
	pursue the relevant purpose



Once all the purposes that legitimize the storage of your personal data have been exhausted, the Coowners will take care to delete them or make them anonymous.

## What are your rights?

Your rights allow you to be in control of your data at all times. Your rights are those of:

- access;

- rectification;
- withdrawal of consent;
- deletion;
- restriction of processing;
- objection to processing;
- portability.

In substance, you, at any time and free of charge and without special charges and formalities for your request, can:

- obtain confirmation of the processing carried out by the Joint Data Controllers;
- access your personal data and know the origin (when the data are not obtained from you directly), the purposes and the purposes of the processing, the data of the subjects to whom they are communicated, the period of retention of your data or the criteria useful for determining it;
- update or rectify your personal information so that it is always exact and accurate;
- revoke the consent at any time, if this constitutes the basis of the processing. Withdrawal of consent in any case does not affect the lawfulness of the processing based on the consent given prior to the revocation;
- delete your personal data from the data banks and / or archives including backups in the case, among others, where they are no longer necessary for the purposes of the processing or if it is assumed to be illicit, and always if they exist the conditions required by law; and in any case if the treatment is not justified by another equally legitimate reason;
- limit the processing of your personal data in certain circumstances, for example where you have disputed its accuracy, for the period necessary for the Joint Data Controllers to verify its accuracy. You must be informed, in due time, even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation itself revoked;
- obtain your personal data, if received or processed based on a contract and with automated tools, in electronic format also for the purpose of transmitting them to another data controller.

The Joint Data Controllers must proceed in this way without delay and, in any case, at the latest within one month of receiving your request. The deadline can be extended by two months, if necessary, taking into account the complexity and the number of requests received. In such cases the Joint Data Controllers, within a month of receiving your request, must inform you and inform you of the reasons for the extension.

For any further information and in any case to send your request, contact the Joint Data Controllers at <u>ES.it.privacy@Valmet.com</u> or jussi.leppala@valmet.com



### How and when can you oppose the processing of your personal data?

For reasons related to your particular situation, you can oppose the processing of your personal data at any time when this takes place for legitimate prevailing reason, sending your request to address <u>ES.it.privacy@Valmet.com</u> or jussi.leppala@valmet.com

You have the right to the deletion of your personal data if there is no legitimate prevailing reason with respect to the one that gave rise to your request.

#### Who can you lodge a complaint with?

Without prejudice to any other administrative or judicial action, you can file a complaint with the competent control authority or that which carries out its tasks and exercises its powers in Italy where you have your habitual residence or work or if different in the State Member where the violation of Regulation (EU) 2016/679 occurred.

Any update of this privacy policy will be communicated to you promptly and by appropriate means and the same will be communicated before proceeding and in time to give your consent if necessary.