

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Information document pursuant to and for the purposes of Article 13 of the Regulation European 2016/679 (GDPR)

Dear Employee/Collaborator,

This is to inform you that your personal data is processed by our company. The processing is carried out in compliance with the criteria provided for by the European Regulation on the protection of personal data, EU REG 2016/679 (hereinafter GDPR) and any other national legislative text, provision or authorization of the competent authority connected to the same. According to the aforementioned legislation, the processing must be based on the principles of correctness, lawfulness and transparency and the protection of your privacy and your rights.

1. IDENTITY OF THE DATA CONTROLLER

Data Controller: NRG Glass Moulds Srl

Headquarters: Via Strada Nazionale, 38/a – cap. 46036 – loc. Revere – Borgo Mantovano (MN)

Contacts:

- Phone: +39 0386 590200
- Email: amministrazione@nrgmoulds.it

2. PURPOSE OF PROCESSING, LEGAL BASIS, STORAGE PERIOD

Purpose of the processing	Legal basis	Storage time
a) Management of the employment and collaboration relationship	Performance of a contract to which the data subject is a party or the execution of pre-contractual measures taken at the request of the data subject (Art. 6 1 lit. b GDPR) Compliance with a legal obligation to which the controller is subject (Art. 6 1 lit. c GDPR)	10 years from the termination of employment
b) Fulfilment of legal or contractual obligations towards social security, welfare and insurance institutions, including supplementary ones		
c) Tax compliance and communications to the tax authorities		
d) Compliance with the regulations on safety at work (Legislative Decree 81/2008 and subsequent amendments and integrations)		
e) Management of reports of wrongdoing through the internal channel	Compliance with a legal obligation to which the controller is subject (Art. 6 1 lit. c GDPR)	As provided for by art. 14, Legislative Decree no. 24/2023, personal data are processed and stored for the time necessary to process the report and in any case no longer than five years from the date of communication of the final outcome of the reporting procedure.
f) Protection of company assets through video surveillance	Legitimate interest of the controller (Art. 6 1 lit. a GDPR)	The data will be processed until you revoke your consent or exercise your right to object.

3. SPECIAL CATEGORIES OF PERSONAL DATA

The Data Controller may process data falling within the category of special data pursuant to art. 9 of the GDPR. the treatment

Last modified: 17/06/2025	PRIVACY POLICY	INF.03.170625.02
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is

necessary to fulfil the obligations and exercise the specific rights of the controller or the data subject in relation to

labour and social security law and social protection, insofar as it is authorised by Union or Member State law or by a collective agreement under the law of the Member States (Art. 9 para. 2 let. b). Specifically, the following data may be processed:

a) data suitable for revealing the state of health (documentation relating to a situation of disability for the purposes of compulsory start-up; certificates of illness, maternity, accident, also for the purpose of documenting absences from work; medical reports in the event of illness for the purpose of payment of the related allowance; advance of severance pay for health reasons; data relating to unfitness for work for assignment to specific tasks; exposures to risk factors; data concerning the incapacity for work for the purpose of benefiting from the family unit allowance);

b) data suitable for revealing membership of a trade union (assumption of trade union offices in order to take leave; or for the request for deduction from salary for the payment of membership fees);

j) data suitable for revealing membership of a political party (for the purpose of requesting permits or leave to hold elected public offices) or philosophical opinions (e.g. conscientious objection);

k) data relating to religious faith and philosophical beliefs (e.g. for the use of religious permits or holidays, for the canteen service, for the execution of trips to foreign countries that require such information for the granting of the visa, etc.);

l) data relating to blood donation or membership of voluntary associations (e.g. Fire Brigade or Civil Protection) for the purpose of managing justifications of absence or requesting reimbursement from public bodies

4. NATURE OF PROVISION

The nature of the provision is mandatory, under penalty of non-termination of the collaboration relationship; optional for the purposes referred to in paragraph 2 f), in the event of failure to provide it in the latter case, the data controller will not use your images.

5. WHISTLEBLOWING

Pursuant to Legislative Decree no. 24/2023, employees and collaborators who become aware of unlawful facts due to their employment relationship can report it through the channels made available by the Company. This involves the processing of data of a common, particular and judicial nature (such as criminal convictions and offences), possibly contained in the report and in the acts and documents attached to it, relating to all natural persons - identified or identifiable - in various capacities involved in the events reported (whistleblower, reported, facilitator, any other third parties). For more information on the processing of data carried out as part of the management of the report and the methods of reporting, please refer to the information published on the Data Controller's website.

6. RECIPIENTS OF PERSONAL DATA

Your data will not be disseminated but, for the purposes indicated above and in compliance with the principles of the Regulation, they may be communicated to:

other employees of the Company, its collaborators, consultants and professionals (in particular, by way of example: competent doctor; accountants and payroll firms in charge; lawyers; technical consultants, as external data processors).

7. DATA TRANSFER

Your data will not be transferred in any way to subjects (natural or legal persons) located outside the EU/EEA.

8. RIGHTS OF THE DATA SUBJECTS

As a Data Subject, you can exercise the following rights (indicated by Articles 15-22 of the GDPR):

- a) access to your personal data (including copies) by requesting confirmation or otherwise of their existence;

- b) rectification of inaccurate personal data and the integration of incomplete personal data;
- c) cancellation of their data, with the exception of those contained in documents that must be compulsorily kept by the Data Controller and unless there is an overriding legitimate reason to proceed with the processing;
- d) restriction of processing;
- e) object to the processing of their personal data, without prejudice to the provisions regarding the necessity and mandatory nature of the data processing in order to be able to use the services offered;
- f) revoke any consent given for non-mandatory data processing, without prejudice to the lawfulness of the processing based on the consent given before the revocation.
- g) lodge a complaint with the Guarantor for the protection of personal data (<http://www.garanteprivacy.it>).

You can exercise all of the above rights by sending an email to amministrazione@nrgmoulds.it

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