

CUSTOMERS

Notice on the processing of personal data pursuant to Article 13 of Regulation EU No 2016/679 (the "Regulation")

Dear Customer,

Citifocus Ltd hereby informs you that your personal data will be processed in accordance with the Regulation and in compliance with the notice set forth below.

We wish to inform you that the personal data protection legislation laid down in the Regulation protects only natural persons and not legal persons.

Consequently, the following information is intended to refer exclusively to your personal data as the legal representative of a company that uses the services of Citifocus Ltd and/or as the contact person of the said company appointed/delegated by its legal representative.

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1. Personal data controller

The data controller is the company Citifocus Ltd (hereinafter the "Controller" or the "Company"), with registered office at Warwick House, 65-66 Queen Street, London EC4R 1EB (UK), e-mail: info@citifocus.co.uk.

2. Object of the processing

The processing may concern your identification data (in particular, forename and surname, tax code, address of residence and/or domicile, telephone and mobile number, e-mail address, any Skype contact) provided when requesting the services of Citifocus and the relationship resulting from such a request.

3. Cookies

We hereby inform you that we may collect data concerning your visits to our website (including, but not limited to, your IP address, browser type, location from which you visited our site), chiefly in order to simplify your future visits and improve your user experience.

For more details concerning the cookies used, please read our cookie policy here: <https://www.citifocus.co.uk/jobboard/cands/cookie-policy.asp>.

4. Data security

Your data will be processed using both electronic and manual tools (paper documentation) and protected with suitable security measures that ensure their confidentiality and integrity.

We follow rigorous security procedures in the storage and disclosure of personal data, to ensure protection against accidental loss, destruction or damage.

We may disclose your information to the third parties referred to in paragraph 7 for the purposes indicated in this Notice. We require all third parties to adopt adequate technical and operating security measures, to protect personal data. Such measures must be in line with EU data protection legislation.

Should you have any suspicions of improper use or loss or unauthorised access of your personal data, you should notify us immediately by sending an e-mail to the Data Protection Officer at the address indicated in paragraph 9.

5. Purposes and legal basis of the processing

We will process your personal data:

- a) in performance of the staff search, selection and supply contract or required pre-contractual measures (including, by way of example: memorisation of data in our databases, presentation of candidates and 'recommended profiles', drafting of remuneration data sheets for staff on supply contracts);
- b) to satisfy the administrative, accounting and fiscal requirements laid down by the legislation in force governing the management of the contractual relationship;

Processing for the aforementioned purposes does not require your consent, pursuant to Article 6(1)(b) and (c) of the Regulation.

- c) Only subject to your consent, however, we will also process your data for marketing purposes, i.e. the sending, by our company, of promotional information and communications, by e-mail or SMS, telephone calls with an operator or mail, concerning services or offers, as well as notifications of events, including networking, organised by the Company, by group companies or by commercial partners (the legal basis for the processing is Article 6(1)(a) of the Regulation).
- d) Without the need for your consent, we may use your personal data where necessary for the pursuit of our legitimate interests, pursuant to and according to the conditions laid down in Article 6(1)(f) of the Regulation (transmission of data for internal administrative purposes within the business group).

We also wish to inform you that, in accordance with Article 130, paragraph 4, of the Italian Privacy Code, and with no prejudice to your right to object without difficulty, we may use your e-mail address to offer you services similar to those covered by the contract, without needing to seek your consent.

6. Submission of data and consequences in the event of refusal of consent

The submission of data for the primary purposes indicated in letters a) and b) of paragraph 5 is mandatory. Should you fail to do so, it will be impossible to provide our services, or establish and proceed with a commercial relationship.

On the other hand, the submission of data for the purposes indicated in letter c) of paragraph 5 is optional. Should you fail to do so, you will not receive promotional communications or be informed of new events or initiatives promoted by the Controller.

7. Recipients of data

The data may be made accessible, brought to the attention of or in any way disclosed to the following parties:

- employees and/or any agents of the Controller, who have been adequately instructed and authorised for such processing;
- Companies within the group of which the Controller is a member (subsidiaries and associated companies), for administrative ends or purposes relating to the performance of the contract;
- Parties, natural or legal persons, called upon by the Controller for the conducting of activities necessary for achieving the purposes indicated above (purely by way of example: IT and applications service)

providers, as the managers of candidacies and e-mail marketing platforms; website operators; accountants, etc.), all of whom shall be appointed Data Processors;

- Parties, whether public or private, natural or legal persons, to whom the Controller is required to disclose the data under legal or regulatory obligations;

The data may be disclosed, for the performance of the contract, to candidates just before they go for interview at the client company (the following are usually transmitted: address of the company and name of the contact person they will meet) and employees to be sent on supply contracts to the company of which you are the legal representative and/or appointed contact person.

Your personal data will not be made public.

8. Transfer of data outside the European Union

Our Company also operates overseas. You can view a list of the countries in which we have a presence at the following link: <https://www.citifocus.co.uk/contact-us.asp>.

As indicated in the previous paragraph, we may share your data with group Companies located outside the European Union for internal administrative purposes or for the performance of the contract (the legal basis for such sharing are performance of the contract or pre-contractual measures and the legitimate interest of the Controller in transmitting the data within the business group).

Moreover, in carrying out its ordinary activities, our Company may call on certain suppliers who operate outside the European Union.

We wish to make it clear that, in any hypothesis of transfer outside the European Union, the guarantees envisaged in articles 44 et seq. of the Regulation shall be adopted.

In particular, should there be no adequacy decision (Article 45 of the Regulation), our Company has prepared contractual instruments containing the standard contractual clauses approved by the European Commission which offer protection for personal information transferred to non-European Union countries (Article 46 of the Regulation).

You may request more information about the contractual clauses in use and/or a list of suppliers who operate abroad from our Data Protection Officer at the address indicated in paragraph 11.

9. Data retention period

The data collected for the purposes indicated in letters a) and b) of paragraph 5 will be kept for the duration of the commercial and contractual relationship and for a further ten years, in order to satisfy the administrative, fiscal and accounting obligations imposed by law.

The data collected for direct marketing purposes, pursuant to letter c) of paragraph 5, will be kept for 24 (twenty-four) months, with no prejudice to your right to revoke previously granted consent at any time.

The data collected for the purposes indicated in letter d) of paragraph 5 will be kept for the time strictly necessary for achieving that purpose, in accordance with the principles of data minimisation and storage limitation

10. Rights of the data subject

We wish to inform you that you may exercise the following rights:

- To obtain confirmation as to whether or not personal data concerning you are being processed;
- Where that is the case, to obtain access to the personal data and information concerning the processing, as well as to request a copy of the personal data;
- To obtain the rectification of inaccurate personal data and to have incomplete personal data completed;
- To obtain, where one of the grounds laid down in Article 17 of the Regulation applies, the erasure of

personal data concerning you;

- To obtain, in the cases stipulated in Article 18 of the Regulation, restriction of processing;
- To withdraw your consent at any time to the processing of data for the purposes for which such consent was sought. (The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal);
- To receive the personal data concerning you in a structured, commonly used and machine-readable format and to request that they be transmitted to another controller, where technically feasible;
- To object to the processing of your personal data where a personal (or third-party) legitimate interest is invoked and where there are elements pertaining to a specific personal situation, which leads you to object to the processing. You also have the right to object to the processing where your personal information is used for direct marketing purposes.
- To lodge a complaint with the Personal Data Protection Authority if you consider that your rights have been infringed, according to the procedures indicated on the website of the Authority: ico.org.uk.

If you wish to exercise one of these rights, please contact our Data Protection Officer, using the contact details provided in paragraph 11 below.

You shall not incur any cost for accessing your personal information (or for exercising one of the other rights). However, if the request for access is clearly unfounded or excessive, we may charge you a reasonable sum. Alternatively, we may refuse to grant your request in such circumstances.

We may need to ask you for specific information, which will help us to confirm your identity and guarantee your right to access information (or exercise any of the other rights). This is a further security measure aimed at ensuring that personal information is not disclosed to persons who are not entitled to receive it.

11. Data protection officer

The Data Protection Officer, appointed by the Data Controller, may be contacted by:

- mail addressed to: Warwick House, 65-66 Queen Street, London EC4R 1EB (UK) FAO The Data protection officer;
- e-mail to: dpo@injob.com

12. Amendments to the notice

Our Notice on the processing of personal data may be modified from time to time. We therefore invite you to consult our website periodically to view the latest updated version.

Place and Date,.....

Signature to mark acknowledgement.....