

Privacy policy for the processing of personal data of family members of Sofidel France S.a.s. employees, pursuant to article 14 of EU Regulation 2016/679

1. Premise

For Sofidel France s.a.s (hereinafter, also, “**Sofidel**”) your privacy and the security of your personal data are particularly important, which is why we collect and process them with the utmost care and attention, adopting specific technical and structural measures to guarantee the security of the processing.

Hereby this privacy policy, we would like to inform you about the purposes and methods of the processing of your personal data, as provided by your family member on the occasion of, and in function of, the establishment of his/her **working relationship** with Sofidel, in compliance with article 14 of the European Data Protection Regulation 679/2016 (hereinafter also “**EU Regulation**” or “**GDPR**”) (hereinafter also “**Regulation**”).

2. Data Controller and Data Protection Officer

The processing of your personal data is performed by Sofidel France s.a.s., as Data Controller, pursuant to the GDPR (hereinafter, also, “**Data Controller**”).

For any questions or requests relating to the processing of your personal data you can contact us by sending a request to the following recipients.

Company Name of the Data Controller	Sofidel France s.a.s.
Registered Office Address	Ban-La-Dame - Eiffel Energie, F-54390 Frouard
E-mail privacy	gdpr.france@sofidel.com

3. Categories of data subject to processing

The personal data processed by the Data Controller may include:

- common data, and personal information (e.g. name, surname, date of birth, address, picture, sex, tax code, etc.);
- contact information (e.g. landlines and/or mobile phone number, e-mail address, etc.);
- personal data of the children of the employee;
- personal data of disabled family members and documentation relating to the family member's disability status (particular categories of data)

- personal data, bank details and any other address of the spouse/former spouse (common personal data);
- personal data, bank details and any other address of the heirs (common personal data).

*(The personal data indicated above will be defined below jointly, for brevity, as “**personal data**”).*

4. Purpose and legal basis for processing personal data

Your personal data shall be collected and processed for the following purposes:

- proper management of the employment relationship established with your family member, in compliance with applicable regulations** (e.g. to allow the use of statutory benefits payable through the employer, payment of family allowances); to allow the management of parental leave, marriage leave, adoption/ foster care leave, family care leave; to allow tax deductions for dependent family members and the processing of the Single Certification; to allow the management of compulsory maternity leave; to allow the management of leave for the care of disabled family members and the management of paid leave pursuant to Italian Law 104/92, on the basis of art. 6 sub. 1, letter c) of the GDPR. (“**data management purposes of the employee’s family members**”).
- emergency contact** (in case there is a need to contact you with reference to your family member employed at Sofidel, on the basis of art. 6 sub. 1, lett. d) of the GDPR (“**emergency contact purposes**”).
- To fulfil any **defensive purposes** as well as to ascertain, exercise or defend the Controller's rights in out-of-court, in court or administrative proceedings, on the basis of arts. 6, sub. 1, lett. f) and 9, sub. 2, lett. f) of the GDPR (“**defence purposes in court**”).

5. Recipients

Your personal data is processed by Sofidel personnel specifically authorised and designated, pursuant to art. 4 paragraph 10 of the Regulation and to art. 2-quaterdecies of the Data Protection Code, which processes data following precise indications from the Data Controller.

Your data can be managed by the HR staff of Sofidel S.p.a. (holding company of the Sofidel Group) as well as by the Data Controller's HR staff.

Your personal data may also be transmitted to third parties, which Sofidel may use for the purpose of organising and/or managing the processing activities.

These subjects offer a suitable guarantee of compliance with the rules regarding the processing of personal data and have also been appointed as data controllers (if necessary) pursuant to art. 28 of the GDPR, and are required to perform their activities according to the specific instructions given by the Data Controller and under the control of the same.

You can request the specific and updated list of such subjects from the Data Controller by writing to gdpr.france@sofidel.com

Finally, your personal data may be transmitted to other subjects, bodies or public authorities, independent data controllers, to whom it is mandatory to communicate your personal data by virtue of legal provisions or orders of the authorities.

6. Transfer of data outside the EU

Your data will not be transferred outside the European Union.

Notwithstanding the foregoing, on a completely residual basis, if some of the third parties pursuant to sub. 5, are located in countries outside the European Union, the transfer of your personal data to such entities will be carried out alternatively on the basis of:

- the presence of adequacy decisions issued by the European Commission;
- the prior conclusion between Sofidel and said subjects of specific agreements, containing safeguard clauses and appropriate guarantees for the protection of your personal data (so-called “Standard Contractual Clauses”, as made available by the European Commission);
- in the absence of the above, your consent, which will be expressly requested on this occasion and prior to the transfer, following information on the level of protection of your personal data present in the country of destination of the data transfer.

7. Storage of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected, in compliance with the principles of minimisation and limitation of storage referred to in art. 5, sub. 1 , lett. c) and e) of the GDPR.

Specifically, your data will be retained:

- with reference to the purposes of subsection 4 of letters a) and b), your data will be kept for a period of 5 years from the termination of the employment relationship;
- with reference to the purposes of subsection 4 of lett. c), your data will be retained until the conclusion of the last degree of judgement.

At the end of such periods, your data will be irreversibly deleted or anonymised.

The Data Controller, however, reserves the right to retain your data for as long as necessary to fulfil the regulatory obligations to which it is subject or to meet any defensive needs.

8. Your rights

Pursuant to and for the effects of the GDPR, you have the right to:

- access (art. 15 GDPR): you have the right to request confirmation if your data is being processed, and to have a copy of the same;
- rectification (article 16 GDPR): you have the right to request the integration of your data if they are incomplete or the correction if they are incorrect;
- erasure (Art. 17 GDPR): in the cases provided for by current legislation, you may request the erasure of your personal data. Sofidel will analyse your request, which will be processed promptly where it deems it legitimate;
- limitation (Art. 18 GDPR): you have the right to request the limitation of the processing of your personal data in the event of unlawful processing or if the data you have provided is not accurate;
- portability (Art. 20 GDPR): you have the right to the transfer of your data to another data controller if they concern processing based on consent and the processing of Sofidel has taken place in an automated manner, and that such transfer is technically feasible;
- opposition (Art. 21 GDPR): you have the right to oppose the processing of your personal data without specifying the reasons if the processing is carried out for direct marketing activities; you also have the right in other cases but only for reasons related to a particular situation that must be specified in your request;
- complaint (Art. 77 GDPR): you have the right to lodge a complaint with the Supervisory Authority for the Protection of Personal Data if it considers that Sofidel has breached your rights with regard to the processing of personal data.
