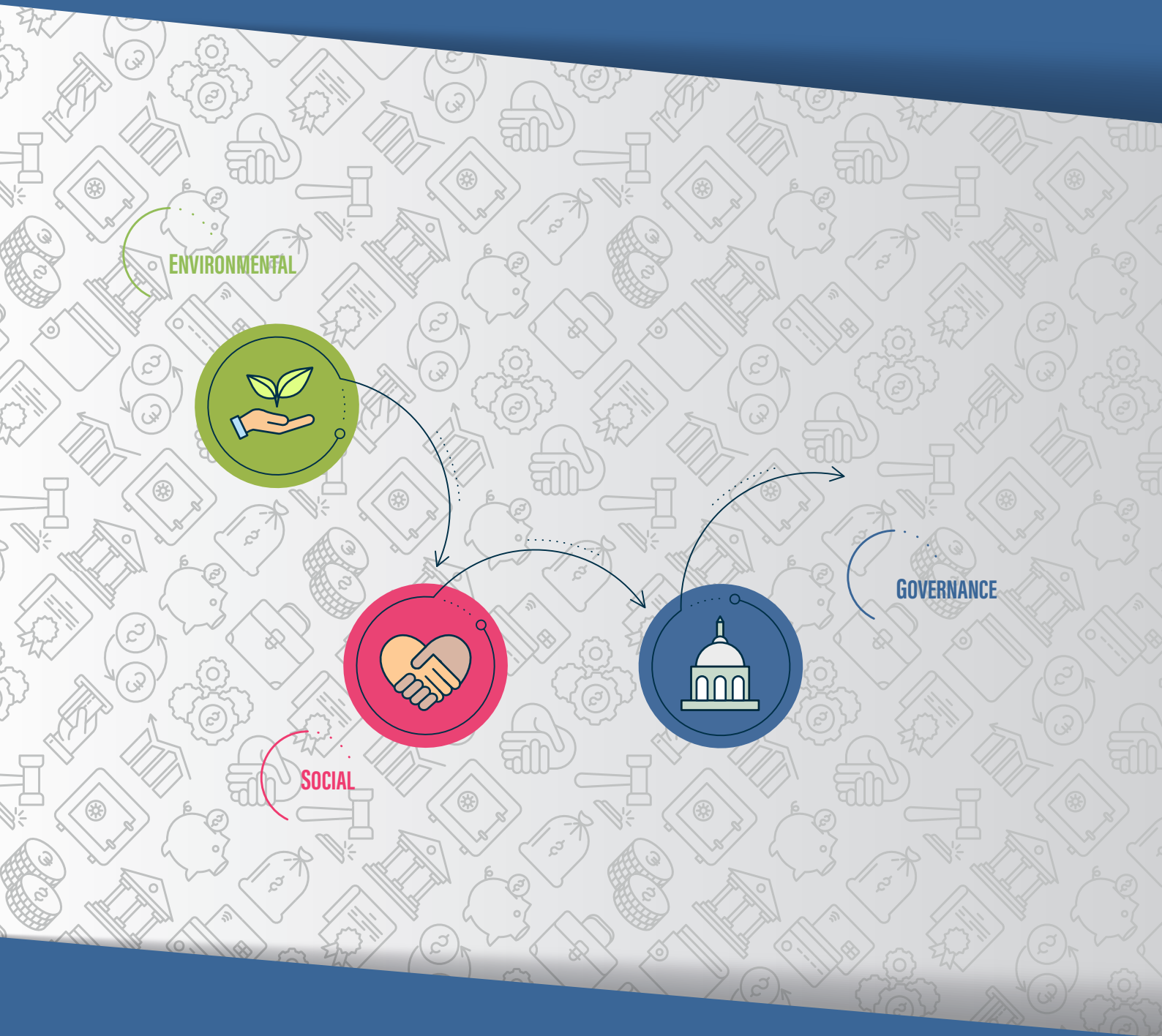


PERSONAL DATA PROCESSING POLICY

openjobmetis





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1. The Commitment of Openjobmetis Group

Openjobmetis Group (hereinafter also the “Group” or “Openjobmetis”), including the Parent Company Openjobmetis S.p.A. and its subsidiaries, recognizes, within the scope of its activities, the importance of guaranteeing the respect and protection of the personal data of all those who interact with the Group, according to the principles of current legislation, as referred to below, and the principles of transparency, lawfulness and correctness.

The large volume of data processed relating to the services offered by the Group on the market requires careful attention to the issues relating to the legislation on the processing of personal data (as provided for by the “GDPR”, Regulation (EU) 2016/679 and by the Privacy Code, Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, hereinafter only “applicable legislation”).

Openjobmetis undertakes to process the data of the so-called “involved parties”, primarily Candidates, Employees, Collaborators and Clients, only for purposes related to the business objectives of the Group.

This Policy aims to provide a reference framework of the principles and practices adopted by the Group with respect to the processing of personal data, also in compliance with the principle of *accountability*.

Furthermore, a Code of Ethics has been drawn up, in force since 2012, with the objective of outlining the conduct and key values of Openjobmetis: integrity, fairness, transparency, responsibility and honesty, principles which inspire the Group daily in carrying out its business. In order to build and maintain a relationship of collaboration, respect and trust with all interlocutors, it formally became the Group’s Code of Ethics in December 2022.

2. Scope and references used

This policy applies to all companies of the Group and to all those who, directly or indirectly, permanently or occasionally, operate with or for the Group, to third parties who have contractually regulated collaborative relationships with Openjobmetis or who represent the Group without employment ties (for example, consultants and other independent collaborators), as well as to all persons who interact in various capacities with the Group (collaborators, consultants, suppliers, customers, outsourcers, etc.).

Openjobmetis expects the recipients of the policy to comply with the commitments and principles of conduct formalized in this policy, reporting any or suspected violations in this regard.

Recipients are required to process personal data exclusively within the scope and for purposes related to their work activities. Furthermore, in carrying out their activities, it is necessary that the recipients undertake not to process, for their own benefit or that of third parties, personal data in the absence of the conditions required by the applicable legislation by implementing responsible behaviour in line with the principles and values of the Group.

3. Principles of conduct in the processing of personal data

Openjobmetis' approach to the protection and processing of personal data, formalized in this policy, complies with national and international laws and regulations, as well as relevant principles and guidelines, including, by way of example and not limited to:

- "GDPR" - Regulation (UE) 2016/679;
- "Privacy Code" - Legislative Decree 196/2003 as amended by Legislative Decree 101/2018;
- Provisions issued by the Guarantor Authority for the protection of personal data ("Guarantor");
- Clarifications and guidelines issued by the European Data Protection Board (formerly Art. 29 Working Party).



○ Compliance with laws and regulations

Openjobmetis is constantly committed to verifying and updating the measures and requirements prescribed by the applicable legislation and by the regulations identified by the competent authorities.

○ Privacy by design and by default

From the moment of determining the methods and means of processing personal data in the context of a new business or system project/activity, adequate technical and organizational measures are adopted/evaluated aimed at “minimizing” the data processed and limiting access to it, in order to act in compliance with the general principles set out in the GDPR and protect the rights of involved parties, also assessing the potential risks and limitations that could arise for these rights. Furthermore, for the purposes of respecting the Privacy by Default principle, Openjobmetis ensures that only necessary personal data is processed by default (e.g. in relation to quantity, volume, category, conservation etc.) for each specific processing operation.

The evaluation of the elements listed above also has the aim of identifying the appropriate security measures to protect the personal data processed, taking into account the state of the art and the costs of implementation, the nature, object, context, the purpose of the data processing and the risk relating to this, guaranteeing the greatest respect for the rights and freedom of the involved parties.

○ Minimisation of data and information

Openjobmetis limits the processing of data to that necessary to pursue the purposes indicated in the relevant Information provided to involved parties.

○ Accountability

Openjobmetis implements adequate technical and organizational measures including a system of written delegations and appointments, aimed at effectively implementing data protection principles, such as minimisation, and integrating the necessary guarantees into the processing in order to meet the requirements of the GDPR and protect the rights of involved parties.

○ **Transparency and communication**

Openjobmetis has adopted tools to inform about the processing of personal data by the Group. For their protection, involved parties are provided with complete and transparent information, the aim of which is to describe the purposes and methods with which the Group processes their personal data.

These measures are also adequate to prevent or counteract and remedy any violations of personal data, including the destruction, loss, modification, disclosure or unauthorized access to data carried out accidentally or fraudulently.

The security measures adopted are classified into the following three macro-categories:

- *physical: The role of physical security is to protect the people who operate the systems, the areas and components of the information system. The physical security countermeasures implemented by the Companies can be attributed to the following: (i) area security: site perimeter protection, physical access controls, physical protection of media; (ii) safety of hardware equipment: protection from accidental or intentional damage, safety of power supply and air conditioning systems;*
- *logical: The field of application of logical security mainly concerns the protection of data and information, applications, systems and networks both in relation to their correct functioning and use, and in relation to their management and maintenance over time: authentication, access control, antivirus, data availability tools, etc.;*
- *organizational: Organizational security requires a series of rules and procedures to be defined aimed at regulating the organizational aspects of the company security processes. Organizational security aspects concern: the definition of roles, tasks and responsibilities; the adoption of specific procedures that complete and strengthen the technological security measures adopted, procedures adopted by the Company, instructions etc.*



○ Responsibility

The GDPR, in article 29, specifies that anyone acting under the authority of the Data Controller and has access to personal data cannot proceed with the relevant processing if he is not duly instructed to do so by the Data Controller himself.


Openjobmetis, as the parent company of its subsidiaries, has provided itself with a Privacy Office, placed below the Personnel Management and a Data Protection Officer (DPO), which has been granted powers by the Board of Directors. Furthermore, through acts of designation and appointments of authorized persons, adequate instructions are given to all persons involved in the processing on the obligations they must respect to protect the correct processing of personal data within and outside the Group.

4. Implementation of the policy

Openjobmetis is responsible for ensuring the correct adoption of this policy by its employees, as well as its implementation and control.

The Senior and Top Management of the Group are responsible for promoting a corporate culture based on the principles outlined in this policy, as well as disseminating and monitoring its application.

Openjobmetis has appointed a DPO whom interested parties can contact to exercise one or more rights provided for by the applicable legislation according to the methods described in the Information made available by the Group. The address *privacyofficer@openjob.it* has been created which all employees and collaborators of the Group can contact for consultancy and/or clarifications regarding the processing and/or requirements to be fulfilled in compliance with their internal role.

A decorative header at the top of the page features a blue background with a pattern of white line-art icons. These icons represent various business and operational concepts, including gears, briefcases, documents, a handshake, a credit card, a laptop, and a person's head with a gear inside, symbolizing thought and strategy.

Openjobmetis encourages all recipients of the policy in question, in accordance with company policies and procedures, to report any suspected or definite breach through specific dedicated channels. Please refer to the “contacts” section on the company websites to file a complaint.

This policy is disclosed within the organization via a specific internal communication and publication on the company website. It is also made available on the corporate websites of the various Group companies, which can be accessed by all relevant stakeholders.

Approved by the Board of Directors of Openjobmetis S.p.A. on 20 February 2024 subject to the favourable opinion of the Control, Risk and Sustainability Committee of Openjobmetis S.p.A. and on the same date adopted by the individual subsidiary companies by deed of their respective legal representatives.

