

**PRIVACY POLICY FOR STAFF AND COLLABORATORS OF COMPANY CUSTOMERS ACCORDING TO SECT.13
AND 14 OF EU REGULATION no. 2016/679 (“GDPR”)**

This notice is released by Rai Com S.p.A. in compliance with personal data protection legislation and concerns the use of personal data belonging to the staff /collaborators of customers with whom the same company is in the process of establishing or already has established a contractual relationship.

Whereas:

- according to sect. 4(7) of GDPR, “controller” means “the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data”;
- according to sect. 4(1) of GDPR, “personal data” means “any information relating to an identified or identifiable natural person (“data subject”)”; therefore, a “data subject” is the natural person to whom the personal data belong, so to exclude legal persons;
- according to sections 13 and 14 of GDPR, the controller shall provide the data subject and the person from whom the data are obtained with prior information on the data processing;
- in the contractual relationship between Rai Com S.p.A. and its customers (hereafter collectively also “**Customers**”), the data subjects involved in the personal data processing performed by Rai Com S.p.A. (hereafter collectively “**Data Subjects**”) are identifiable as subjects who work for (also as professionals) or cooperate with Customers, whose data are transferred from time to time to Rai Com S.p.A. for the purpose of establishing/executing/managing a contractual relationship;
- this notice is addressed by Rai Com S.p.A. to Data Subjects through its official website; the full acknowledgement of its key terms by the Data Subjects has been guaranteed by Customers in their agreements with Rai Com S.p.A.

Therefore, given the above

Rai Com S.p.A., a company with a sole shareholder, having its registered office in Via Umberto Novaro 18, 00195 Rome Italy, VAT and Tax code no. IT 12865250158, share capital of Euro 10.320.000 fully paid-in, REA n. RM 949207, subject to the direction and coordination of RAI – Radiotelevisione Italiana S.p.A. (with registered office in Rome, Viale Mazzini n. 14, Tax Code: 06382641006), in its capacity of data controller (“**Controller**”);

hereby provides

the Data Subjects with the additional following information on the personal data processing by the Controller, as well as their disclosure and dissemination and the nature of their provision.

Data to be processed

The following Data Subjects’ identification data will be subject to processing:

- name, surname, e-mail and postal address, job title, telephone number;

Purposes of Data Processing

The Controller processes personal data of Data Subjects for the following purposes: establishment and execution of agreements with Customers as well as for purposes strictly related to them, including the exercise of rights and/or the performance of obligations deriving from the same; performance of obligations

deriving from applicable law to be enforced by Rai Com S.p.a. (e.g. health and safety obligations, disclosure and/or transparency obligations as per Law no. 220/2015 and/or other relevant law provisions).

Legal basis of the processing

Data processing is lawful when the data are collected and used:

- for the purposes of a legitimate interest pursued by the Controller for the correct execution of the agreements as per applicable law;
- when processing is necessary for compliance with a legal obligation to which the Controller is subject (e.g. ensuring safety on working premises and/or comply with public procurement rules if applicable and/or antimafia code if applicable);

Nature of Data Provision

The provision of data is optional but necessary because any refusal to provide such data will result in the inability for the Controller to continue the establishment and management of the contractual relationship, without prejudice to any rights and actions to protect Controller's interests.

Data Processing Modalities

With reference to the above mentioned purposes, data will be processed in order to guarantee their protection and confidentiality, by manual, electronic and telematic means fit for memorizing, managing and transferring the same data. The logic of processing will be strictly related with the illustrated purposes.

The data were obtained both from the Data Subject (sect. 13 GDPR) and third parties (sect. 14 GDPR).

Data Storage

Data will be stored for the entire duration of the agreement and anyway for the period necessary for the management of any claims, legal actions and litigation for the protection of the rights of Rai Com S.p.A. and/or other companies in the same group of the Controller, defined according to section 2359 of Italian Civil Code (here after also "**RAI Group**"). After such period has elapsed, data will be erased and/or destroyed.

In any event, Controller will take each and every care to avoid the use of data for an indefinite term and it will periodically verify, in a suitable manner, if there is still an interest in the processing of such data.

Disclosure and Access to Data — Recipients of Personal Data

Data will be accessible by:

- employees and collaborators of Controller as it may be required by their job role or title, provided they have received adequate instructions in order to avoid losses, destruction, unauthorized access or unlawful processing;
- employees and collaborators of third companies which, on behalf of the Controller perform activities connected with the data processing purposes, including other companies pertaining to the RAI Group Further information on the names of the companies part of the Group can be requested writing to privacy.raicom@rai.it.

Data Processors

Data might also be used by third parties performing services on behalf of the Controller, acting as processors and/or persons appointed for the processing under the direction and control of Rai Com S.p.A.

The updated list of the Data Processors can be obtained filing a request to the address privacy.raicom@rai.it.

Non disclosure of data

Data obtained during the establishment and the execution of the agreement will not be disclosed to unidentified parties.

Transfer of data abroad

Data might be transferred abroad and processed by third parties, located in EU and extra-EU countries in reason of their performance of services on behalf of Controller; in this case, such companies will act as processors and the activity will be subject to data protection through specific contract provisions.

Data Subjects' Rights

As regards data processing, the Data Subject has the right at any time: to obtain confirmation as to whether or not personal data concerning him or her are held by the Controller, to know the contents and the source, to ask for integration or rectification, or, if eligible by law, to obtain portability, restriction of processing, erasure of processed data, and to lawfully object to the processing of data.

You may exercise the above rights or obtain information on data by sending a written request to Rai Com S.p.A- Privacy Committee, to the following addresses:

- via e-mail: privacy.raicom@rai.it;
- via post: Rai Com S.p.A., via Umberto Novaro 18, 00195, Roma (RM), Italy.

The Data Subject has the right to lodge a complaint with the Italian Data Protection Authority (Autorità Garante per la Protezione dei Dati Personali) in case of supposed violation of his or her rights or in case of lack of response to his or her requests.