PRIVACY POLICY ON PERSONAL DATA PROTECTION

CTAO gGmbH, with registered office in Saupfercheckweg 1, 69117 Heidelberg (Germany),
German VAT no. DE296943397, enrolled with the HRB of the Court of Mannheim (Germany) under
no. 720310, Italian Fiscal Code, 94136840215, domiciled in Bologna, Via Piero Gobetti, 93,
(hereinafter, "Data Controller"), as data controller, informs you pursuant to art. 13 of Legislative
Decree dated 30.6.2003 no. 196 (hereinafter, "Privacy Code") and art. 13 of EU Regulation
2016/679 ("GDPR") that your personal data shall be processed according to the following
modalities and for the following purposes:

1. SCOPE OF DATA PROCESSING

The Data Controller processes the personal data you have communicated during the selection
phase or during the job interview and, subsequently, upon entering the employment relationship
with the Data Controller (hereinafter, "Data") or "Personal Data":
- Identification Data such as, by way of example, name, surname, address, image, etc.;
- Sensitive Data such as the adherence to a trade union (trade union proxies to the extent of
  withholding the relevant amounts and payment to the union); health condition (e.g., data
  registered in medical certifications relating the absences for sickness, accidents, maternity
  certificates or requested for the attitude to perform specific works).

2. PURPOSES OF DATA PROCESSING

Your Data are processed, without your prior consent pursuant to art. 24 lett. a) and b), art. 26 para.
4 lett. d) Privacy Code and art. 6 para. 1 lett. b) and c), art. 9 para. 2 lett. b) and h) GDPR, for the
following purposes:
- the correct performance of personnel process selection;
- the correct and complete management of the employment relationship;
- the fulfilment of obligations, even pre-contractual one, deriving from the employment
  relationship;
- the fulfilment of legal and contractual obligations, including those deriving from any possible
  collective bargaining agreement;
- the fulfilment of obligations against social security and assistance institutions, both
  mandatory and integrative ones;
- the assumption of obligations against the tax authorities;
- the book-keeping and the connected relevant accountancy obligations;
- the filling in and the elaboration of tax returns and the fulfilment of the connected
  obligations;
- the people management;
- the health and safety in the working place;
- the performance of services of internal control (security, productivity, service quality,
  patrimonial integrity);
- the legal and economic management of personnel (correct qualification of remuneration;
  calculation and payment of the remunerations and various compensations, application of
  the social security and assistance laws, payment of registration fees to trade unions, etc.);
- the maintenance and management of the information system;
- the training of personnel;
- the possible management of litigation and the exercise of the Data Controller’s defense
  rights in Courts;
- the prevention and repression of unlawful actions, even under a disciplinary stand-point.

3. MODALITIES OF DATA PROCESSING

The processing of your Data is carried out, both according to hard paper and electronic modalities
by means of the operations as to art. 4 Privacy Code and art. 4 GDPR and, specifically, data
collection, registration, organization, storage, consultation, elaboration, amendment, selection, mining, confrontation, usage, interconnection, blockage, communication, cancellation and destruction.

The Data Controller shall process the Personal Data for the time necessary to fulfil the above purposes and anyway for no longer than 10 years after the termination of the employment relationship.

4. NATURE OF THE DATA PROVISION AND CONSEQUENCES OF A REFUSAL TO ANSWER

The provision of Personal Data is mandatory. The possible refusal to provide said Data may entail failure to enter into or continue the employment relationship.

5. ACCESS TO DATA

Your Data may be made accessible for the above purposes to:
- employees and/or collaborators of the Data Controller, in their quality of persons in charge of the processing and/or internal data processors and/or system administrators;
- third subjects (for example, certified accountant, pay-roll consultant, health bodies, integrative social security and assistance funds also company ones, banks, brokerage and administrative agencies, employers' associations, professionals, etc.) who perform activities in outsourcing on behalf of the Data Controller and who will process the Data in their quality of external data processors.

6. DATA COMMUNICATION

Your Data may be communicated for the above purposes, without your prior consent pursuant to art. 26, paragraph 4, letter d) Privacy Code and art. 6, paragraph 1, letter c) GDPR, to the following subjects that will process them in their quality of autonomous data controllers:
- Budgetary Ministry, Tax Authority, ministerial bodies and competent Authorities;
- Local Institutions (Regions, Provinces, Municipalities);
- Regional and Provincial Tax Commissions.

Your Data shall not be disseminated in any way and shall not be object of transfer to extra EU countries.

7. DATA SUBJECT'S RIGHTS

In your quality of data subject, you will anytime be able to exercise the rights as to art. 7 Privacy Code and 15 GDPR and, specifically, the rights to:
- obtain confirmation about the existence or not of Personal Data relating to you, even if not yet registered, and their communication under an comprehensible way;
- obtain the indication of the: a) source of the Personal Data; b) purposes and modalities of the processing; c) logic applied in case the processing is performed by electronic instruments; d) identification references of the data controller, data processors and the appointed representative; e) subjects or categories of subjects to who Personal Data may be communicated or who may come to know as appointed representatives within the territory of the State, data processors or persons in charge;
- be informed about the existence of proper guarantees in case of transfer of Data;
- obtain the: a) update, rectification, or whether you are interested, the integration of Data; b) cancellation, transformation into anonymous for or block of the Data processed in breach of the law, including those data which storage is not necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) statement that the operations as to letters a) and b) have been brought to the knowledge, also in relation to their content, of those to whom the Data have been communicated or disseminated, save
the case in which said fulfilment is impossible or entails a use of means that is evidently unproportioned with respect to the protected right;

- oppose, in all or part: a) for lawful grounds to the processing of Personal Data that refer to you, even if pertaining the purpose of the collection; b) to the processing of Personal Data that refer to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication.

You are also entitled to the rights as to articles 16-21 GDPR (right to rectification, right to oblivion, right to portability of data, right of opposition), as well as the right to file claims with the Data Protection Authority.

8. MODALITIES OF EXERCISE OF RIGHTS

You shall be able to exercise your rights anytime:

- by sending a registered letter with return receipt to the address of the Data Controller in Bologna, Via Piero Gobetti, 93;
- by sending an e-mail to info@cta-observatory.org.

9. DATA CONTROLLER, DATA PROCESSOR, AND PERSON IN CHARGE OF THE DATA PROCESSING

The Data Controller is CTAO gGmbH, with registered office in Saupfercheckweg 1, 69117 Heidelberg (Germany), and elected domicile in Bologna, Via Piero Gobetti, 93.

Bologna, 26 Oct. 2017 for CTAO gGmbH: [Signature]