



Privacy Policy

Italy

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Information policy pursuant to Articles 13 and 14 of the EU Regulation no. 2016/679

The Company **Aurora Energy Research srl**, with registered office in **Rome, Viale Luca Gaurico 9/11** (hereinafter, the “**Company**”), as employer and Data Controller, will collect and process your personal data and, if applicable, those of your family members. The aforementioned data will be processed in compliance with the provisions of EU Regulation 2016/679 (hereinafter, the “**Regulations**”), Legislative Decree June 30th, 2003, no. 196, as amended by Legislative Decree 10 August 2018, no. 101 (hereinafter, the “**Privacy Code**”) and Law May 20th, 1970, no. 300 (hereinafter, the “**Workers’ Statute**”). Pursuant to Article 13 of the Regulations, the Company is required to provide you with information regarding the processing of the above-mentioned data.

1. Data Controller

The Data Controller of personal data is the Company **Aurora Energy Research srl**, with registered office in **Rome, Viale Luca Gaurico 9/11**, phone number +39 0645258936, pec auroraer@legalmail.it.

2. Data source

Your personal data and those of your dependants or cohabiting family members, will be acquired directly from you (e.g. at the time of the establishment of the employment relationship) or also from third parties (e.g. from social security organizations, institutions and associations).

With specific reference to the processing of your family members’ data, you undertake to inform them of such processing, including by providing them with this notice.

3. Purpose of processing

Personal Data will be processed during the ordinary course of the Company’s business for the following purposes:

- a) fulfilment of legal and contractual obligations;
- b) fulfilment of obligations to social security and assistance institutions, supplementary pension funds and health funds (for both mandatory and contractual insurance);
- c) fulfilment of tax and accounting obligations, including to the tax authorities;
- d) fulfilment of obligations arising from insurance contracts aimed at covering **(i)** risks related to the employer’s responsibility for occupational hygiene and safety and occupational illnesses, **(ii)** damages caused to third parties in the exercise of the work activity, **(iii)** from occupational accidents and illnesses, **(iv)** in case of death or temporary or permanent disability;
- e) management of the labour relationship and employees’ presence control in the workplace;
- f) for defensive purposes, in extrajudicial and/or judicial proceedings of a civil, criminal or administrative nature;
- g) security purposes: to this end the Company has implemented a video surveillance system (“**VSS**”) to prevent unauthorized accesses to the workplace and protect individuals and assets inside this area. VSS will support the identification of any individuals responsible for property related crimes and other wrongdoings (if any) and will enhance the exercise of the Company’s defensive right in court or in any other competent venue.

4. Legal basis of processing and provision of data

For the purposes mentioned in section 3., **letters a)-e)**, the legal basis is represented:

- for common data, (i) in the performance of the contract or in the execution of pre-contractual measures taken at the request of the data subject pursuant to Article 6 (1) (b) of the Regulations; (ii) in the performance of a legal obligation to which the Company is subject pursuant to Article 6 (1) (c) of the Regulations
- for special categories of data, (i) fulfilling the obligations and exercising the specific rights of the Data Controller and the data subject in the field of labour and social security law and protection pursuant to Article 9 (2) (b).

For the purposes referred to in section 3., **letters f) and g)**, the legal basis of the processing consists, for common data, in the legitimate interest of the Company pursuant to Art. 6.1 letter f) of Regulations; for data belonging to special categories, in the need to ascertain, exercise or defend a right in Court pursuant to Art. 9.2 letter f) of the Regulations.

The provision of your personal data is necessary for the conclusion of the contract. Failure to provide it for the above purposes determines the impossibility of establishing and managing the working relationship itself.

5. Categories of processed data

For the fulfilment of the purposes above described, the Company processes yours and your dependents' or otherwise members of your household's personal data (such as first name, last name, residential address, contact details). The Company, in the course of the employment relationship, may also become aware of categories of personal data in accordance with Article 9 of the Regulations as well as personal data relating to criminal convictions and offenses under Article 10 of the Regulations concerning you and, if applicable, your family members, such as, by way of example:

- data pertaining to health status for needs related to personnel management, verification of aptitude to perform certain jobs, fitness for service (in this regard, it should be noted that the employer does not have access to specific information on the employee's state of health or any pathologies; such information is collected and screened by the occupational health physician who transmits to the employer only the judgement of suitability or unsuitability for the specific tasks), recruitment of personnel belonging to the so-called protected categories, maternity, hygiene and safety at work, performance of insurance and social security practices (compulsory and contractual), welfare treatments, social security redemptions and reconciliations, accident and/or casualty reports, enjoyment of particular exemptions or work permits, related to particular health conditions of employees or their family members;
- data pertaining to the state of health acquired for the purposes of tax assistance and the disbursement of contractually provided social welfare benefits and for access to welfare services;
- data suitable for detecting membership in organizations of a trade union nature for fulfillments related to the payment of membership fees or the exercise of trade union rights;
- data apt to detect political opinions or religious beliefs or membership in a political party, associations or organizations of a religious, philosophical, political or trade union nature (e.g. for requirements related to the request for leave or vacations for festivities or expectations for elective public offices);
- data capable of revealing racial and ethnic origin for the purposes of establishing and managing labour relations with foreign workers;
- with reference to VSS, images are captured by video cameras located at the entrance of the workplace as specified in the map available in the Company's intranet site and in the Company's premises. A warning sign nearby each video camera informs you that the area is monitored by VSS.

6. Methods of data processing

Personal data will be processed using paper and/or computerized tools, and/or by VSS (only for security purposes specified in section 3, letter g), by parties specifically authorized to process them. The processing is carried out only with logics and through forms of organization of the data strictly related to the obligations, tasks and purposes of the same processing, guaranteeing the confidentiality and security of the information. Images captured by the VSS may be viewed only by specifically authorized persons as well as by the VSS maintenance provider, appointed Data Processor pursuant to article 28 of the GDPR, to the extent strictly needed to perform the maintenance agreement for an efficient and secure use of the VSS. The list of these authorized persons can be made available upon written request to the Data Controller.

The Company does not use automated processes, including profiling for the achievement of the purposes set forth in this policy.

7. Categories of subjects to whom the data may be communicated

For the pursuit of the aforementioned purposes and within the limits strictly pertinent to them, personal data (yours and possibly those of your family members) will or may be communicated to the following subjects: **a)** the competent social security and insurance institutions and funds as well as insurance companies and bodies in charge of social security and health supervision; **b)** the occupational health physician pursuant to Legislative Decree of April 9th, 2008, no. 81; **c)** the financial administration; **d)** trade unions and trade associations; **e)** any competent authority in case of litigations and/or investigations in connection with any wrongdoings (attempted and/or consummated).

In addition, external companies and professionals to whom the Company refers may carry out the processing of personal data inherent to or related to your employment relationship. In particular, the Company avails itself of the collaboration of external parties for the following activities: **a)** management of payment services, bookkeeping, contractual and legal advice; **b)** processing of payrolls, calculation of skills, fulfilment of all administrative, fiscal, social security, welfare aspects and obligations, and anything else necessary for the management of the employment relationship; **c)** processing services or instrumental to those of the Company such as filing, transmission, transport and sorting of communications; **d)** maintenance of computer systems and VSS.

The above-mentioned parties will process personal data in their capacity as Data Processors or Co-Processors. A detailed and constantly updated list of the subjects to whom personal data may be communicated can be requested to the Data Controller.

Your personal data are, in addition, known to employees and other collaborators, including occasional collaborators, of the Company assigned to the management of personnel, who, in relation to the specific tasks performed, have been specifically authorized to the processing.

Your personal data will not be disclosed in any way.

8. Transfer of personal data outside the EU

Your data may be transferred outside the European Economic Area if this is necessary for the management of your employment relationship. In the event that such a transfer is necessary, this can only be done after verifying that the Country in question guarantees an “adequate” level of protection and in compliance with current legislation. In particular, the Company will verify that such a transfer is based on one of the appropriate safeguards identified in the Regulations, including (a) European Commission adequacy decisions concerning the States in which the receivers of the data are located, (b) standard contractual clauses developed by the European Commission, (c) binding corporate rules adopted by the Company.

9. Personal data conservation period

Your personal data will be retained for as long as is strictly necessary in relation to the purposes of processing outlined in letters a) to e) of this policy.

In particular, data related to the purposes outlined in letters a), b), c), d) and e) will be retained for the 10 years following the termination of the employment relationship, which is the time prudentially estimated as adequate to prove the fulfilment of social security and welfare obligations or towards the financial administration or to defend a right in Court. It is understood that in the event of any interlocutions or administrative proceedings involving the social security and welfare institutions or the financial administration or the filing or litigation related to the employment relationship during the pendency of the time limit, this time limit will be extended until the settlement of the proceedings in the administrative or judicial Courts by a non-appealable decision.

The regular storage period of images captured by VSS (collected for the purpose outlined in letter g) of section 3)) does not exceed 24 hours, except for closed weekends and/or longer business holidays and/or for the need to take legal action against an offender (in case of detected wrongdoings) and/or to meet requests of public authorities which might be reasons for a longer storage period.

10. Rights under Articles 15 and followings of the Regulations

The Regulations gives the person to whom the personal data refer specific rights. In particular, the data subject, where the conditions are met and provided that there is no derogation from the rights recognized by the Regulations (Art. 23 of the Regulations), has the right to:

- obtain confirmation as to whether or not personal data concerning him/her are being processed, and if so, to obtain access to and communication of his/her personal data (Art. 15 of the Regulations);
- obtain the rectification of inaccurate personal data concerning him/her as well as the integration of incomplete personal data, including by providing a supplementary declaration (Art. 16 of the Regulations);
- revoke his/her consent, where it forms the basis of the processing, and in any case, to obtain the deletion of personal data concerning him/her without undue delay, where the conditions are met (Art. 17 of the Regulations);
- obtain the restriction of processing (Art. 18 of the Regulations);
- receive, in a structured, commonly used and machine-readable format, personal data concerning him/her as well as to transmit them to another data controller (Art. 20 of the Regulations);
- object, at any time, to the processing of personal data concerning him/her (Art. 21 of the Regulations);
- file a complaint with the supervisory authority.

11. Methods of exercising rights

The aforementioned rights may be exercised, by request made without formalities, by sending an email to romeoffice@auroraer.com.

The Company, in case of exercise of the rights, undertakes to give feedback to the interested party within one month of receipt of the request in writing or by other means, including, where appropriate, by electronic means in a concise, transparent, intelligible and easily accessible form.

Best regards

John Alexander Feddersen
for the Company



Rome, 14/06/2024

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