# Job application Privacy Policy

ACQUA DI PARMA pays particular attention to the processing, confidentiality and safety of your personal data.

The aim of this Privacy Policy is to provide you with clear, simple and complete information about how we process the personal data you give us or the data we may collect through the various contacts you may have with us (e.g. shop, customer relations, website, social networks, digital applications, events), how it may be transferred to third parties and your rights and options to control your personal information and protect your privacy.

Acqua di Parma S.r.l. ("Acqua di Parma"), a limited liability company with headquarters located at Via Giovanni Spadolini 7 Building B 20141 Milan, Italy registered in the companies register under no. 04215670375, VAT number 04215670375, is the data controller of personal data collected when you apply to a job offer from ACQUA DI PARMA in the sense of regulations applying to personal data, in particular Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereinafter the "GDPR").

# What is "personal data"?

Personal data is any information relating to an identified or identifiable natural person, directly or indirectly, by reference to an identification number or to one or more elements specific to him or her, such as his or her name, first name, date of birth, photograph, etc.

#### Why and how do we use the Personal Data we collect?

# How do we collect your Personal Data?

We collect your Personal Data in the following ways:

 directly from you when you use our Website and our services (by filling out various forms on the Website, by communicating directly with us through our institutional departments, etc.) and when you respond to a job offer from Maison ACQUA DI PARMA.

#### What Data do we collect?

We collect several types of Personal Data about you:

- Personal Data that we collect directly from you
- We collect Personal Data that you communicate to us directly when you use our Website.

This is specifically the case when You:

- · Interact with us using contact forms,
- Respond to job offers.

The categories of Personal Data we collect include:

- Identification and contact information: e.g., last name, first name, mailing address, contact details needed to identify You when You interact with Us,
- Application information: e.g., last name, first name, email address, telephone number, professional experience and all the information You provide by sending your application and/or your curriculum vitae: photo, skills, education level, spoken languages, salary expectations, home address, hobbies, family status, etc. We only collect and store this Data in connection with the management of our own job offers and do not use them for any other purposes, including for commercial purposes.

#### On what legal grounds and for what purposes do we use the Data we collect?

In accordance with the applicable personal data protection regulations, we only collect Personal Data when we have a legal basis for doing so.

Personal Data is collected either:

- (i) based of pre-contractual measures,
- (ii) based your consent,
- (iii) in our legitimate interest,
- (iv) to meet our legal obligations.
- (i) We collect your Personal Data on the basis of pre-contractual measures, particularly in the context of processing applications (CV and cover letter) and managing interviews.
- (ii) We collect Personal Data on the basis of your consent for the following purposes:
  - To share opportunities that may match your profile and keep you informed about the life of Maison ACQUA DI PARMA,
- (iii) We collect Personal Data on the basis of our legitimate interest for the following purposes:
  - Manage your requests and questions: We use your Data to provide you with the information you request
  - Ensure the defense of our interests in the event of a dispute or legal action,
  - Prevent fraudulent acts to ensure the security of our assets and content.
- (iv) We may also be required to retain your Personal Data when required by law or to assert our rights under the law.

#### Who has access to your Data?

# **Accessibility within Maison ACQUA DI PARMA**

Your Data is processed by us for the purposes referred to above and is only accessible to staff members who need to know it in the course of their duties.

In this regard, your Personal Data is processed by the following departments:

- The Human Resources Department of Maison ACQUA DI PARMA for the management of your applications for job offers from the Maison;
- The Legal and Anti-Fraud Departments of Maison ACQUA DI PARMA for the management of fraudulent acts or legal actions, if applicable.

# Accessibility by third parties

Your Data may also be made accessible to third parties, namely:

- (i) our subcontractors and service providers acting for technical and logistical reasons (carriers, Website hosting, security and maintenance providers, fraud management service providers, technical service providers responsible for sending e-mails and newsletters, anti-spam and anti-bot services, recruitment agencies which may provide Us with advice on the management of our candidates' databases and help with the selection of profiles within such databases, etc.);
- (ii) other LVMH Group affiliates for recruitment purposes: when you apply to an LVMH Group affiliate's job offer, this affiliate collects and processes your Data as independent data controller. In such case, your Data will be processed according to this affiliate's personal data protection policy, which You may obtain by contacting it directly. Likewise, the rights You enjoy pursuant to personal data protection laws must be directly enforced against it;
- (iii) any authority, court or other third party when disclosure is required by law, regulations or a judicial decision, or if such disclosure is necessary to protect and defend our rights.

# Is Personal Data transferred outside the European Economic Area?

Your Data is processed in France by Maison ACQUA DI PARMA. However, We may rely on certain service providers, which are located abroad or which themselves rely on processors located abroad, including outside of the European Economic Area (EEA) in countries where personal data protection laws differ from those that apply in the EEA.

With reference to the data relating to applications, the LVMH Group has adopted binding corporate rules ("BCR") which the French Supervisory Authority (the CNIL) has declared

to be compliant with current legislation and suitable for offering an adequate level. of protection in case of data transfer within the Group, also outside the European Economic Area.

# How long do we keep your Data?

The legal retention periods defined by ACQUA DI PARMA comply with the CNIL's recommendations and the legal obligations to which ACQUA DI PARMA is subject.

- Purpose: Management of your requests and queries
- Categories of Data concerned: Identification data (name, first name, email address, information necessary for your identification when you interact with us).
- Retention period before destruction: Duration necessary for the management of your requests and questions. Your Data will then be destroyed or anonymized, unless we are required to retain it to fulfill our legal obligations for the applicable limitation period.
- Purpose: Management of your applications for job offers from Maison ACQUA DI PARMA
- Categories of Data concerned: Application information.
- Retention period before destruction: Duration of two (2) years from when the Data has been provided or from the last contact with You. At the end of this 2-year period, Maison ACQUA DI PARMA may contact You to know whether You want us to keep retaining your Personal Data, for the purpose of informing You of an opportunity that may arise and match your career aspirations and skills. In any event, your Data will be erased at your request, within a maximum period of 1 month from your request.
- Purpose: Disputes/claims
- Categories of Data concerned: Data relating to disputes/claims.
- Retention period before destruction: Duration of the claim + 5 years from the claim.
- In the event of legal action: duration of the procedure until the full execution of the court decision or settlement agreement.

# What are your rights regarding your Data?

#### Access, rectification, and portability

In accordance with current regulations, you have a right to access your Data. You also have the possibility to request the correction of your Personal Data that would be

inaccurate. You also have the right, depending on the purpose of the processing, to request that incomplete Personal Data be completed.

To respond to your request, we may ask you to provide us with proof of identity. We may also ask you to provide us with additional information or supporting documents. We will endeavor to respond to your request as soon as possible. You can, within the limits provided by law, exercise your right to data portability, allowing you to retrieve, in an interoperable format, the Personal Data you have communicated to us.

# Right to erasure of your Data and limitation of the processing of your Data

You can request the erasure of your Personal Data in the following cases:

- You believe that the processing of your Personal Data that we carry out is no longer necessary for the purposes referred to in this Data Protection Policy,
- You consider that the processing is unlawful or dispute the accuracy of the Data we process concerning you,
- You have withdrawn your consent to the processing of your Data. You can also, within the limits provided by law, request the limitation of the processing of your Data. Please note that despite the exercise of your right to erasure of Data or to limitation of processing, we will retain some of your Personal Data when required by law or in order to exercise or ensure the defense of our rights.

#### How to exercise your Data protection rights

You can exercise your data protection rights in the following ways or if you have any questions or complaints regarding the processing of your personal data.

To exercise your rights or for any other questions relating to the collection and processing of your data by Acqua di Parma you can contact directly Acqua di Parma by sending an email to the Acqua di Parma's Data Protection Officer at dpohr@acquadiparma.it or a non-registered postal letter Acqua di Parma S.r.l. Via Giovanni Spadolini 7 Building B 20141 Milan, Italy.

You also have the right to contact the data protection authority in your country to file a complaint against ACQUA DI PARMA 's data protection and privacy practices. We would also like to inform you of the contacts of other authorities in Europe that you can find and contact on the website of the European Data Protection Board:

https://edpb.europa.eu/about-edpb/board/members\_en