SAMPI JOB APPLICANT PRIVACY NOTICE

1. Introduction

This Job Applicant Privacy Notice ("**Notice**") describes the steps that Sampi, Via A. Vespucci,1 Altopascio (IT) ("**Company**"), part of IDEX Corporation ("**IDEX**"), takes to protect the Personal Data that we Process about job applicants. The Company is committed to the protection of the Personal Data that we Process about you consistent with the data protection principles set out in all applicable Data Protection Law. This Notice informs you how we Process your Personal Data if you apply for a position with Sampi.

In regard to the Processing of Personal Data of website users, please see our Website Privacy Notice, which you may access here https://www.sampi.it/privacy-policy/. Please note that in the course of the application process data may also be processed by the respective operator of the network or platform through which you came across one of our job postings, such as LinkedIn. For such Processing, the respective operator of the network or platform is the Data Controller. Please consult the privacy policy of the respective operator of the respective network or platform for details.

This Notice may be amended from time to time. We will post any change to this Notice a reasonable period of time in advance of the effective date of the change.

2. Definitions

The following terms are used within this Notice and are defined as follows:

Term	Definition
Consent	Any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he/she, by a statement or by a clear affirmative action, signifies agreement to the specific processing of his/her Personal Data. It has to be a clear affirmative act ("Opt-In"). Silence or inactivity are not sufficient. Consent may be withdrawn at any time with effect for the future.
Data Controller	The natural or legal person or other body which alone, or jointly with others, determines the purposes and means of the Data Processing.
Data Processing	Any operation, or set of operations, which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Data Processor	A natural or legal person, public authority, agency or other body, which processes Personal Data on behalf of the Data Controller (Article 28 GDPR).
Data Protection Law	All applicable state, local and federal/national laws related to data protection including, but not limited to, GDPR.
Data Protection Officer ("DPO")	The person which is appointed by the Company (only where required by law) to protect the Data Subjects' rights and to act as the point of contact between the Company and you in order to ensure that the Company complies with all applicable Data Protection Law.
Data Subject	Any person to whom the respective Personal Data refers.

European Economic Area ("EEA")	The Member States of the European Union, plus Norway, Iceland and Liechtenstein.
GDPR	the EU General Data Protection Regulation 2016/679.
Personal Data	Any information relating to an identified or identifiable natural person (Article 4 GDPR).
Sensitive Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (Article 9 GDPR).
Supervisory Authority	An independent public authority, which is established by a European Union Member State (Article 51 GDPR) or any other public authority which is responsible for monitoring the application of Data Protection Law.

3. Identity and Contact Details of the Data Controller and the Data Protection Officer

The Company is responsible for Processing your Personal Data and is the Data Controller.

If you have any questions about this Notice, please contact us at

S.a.m.p.i. S.p.A.

Via A. Vespucci, 1 – 55011 Altopascio (IT)

Email: sampi@pec.it

You can contact our Data Protection Officer at sampi.gdpr@idexcorp.com.

4. Categories and Sources of Personal Data Processed

The Company Processes different categories of Personal Data that is provided to us through your application and during your application process. These may include:

Contact and identity details, including name; marital status; gender; nationality; date of birth; home address; and contact details.

- **Your application documents and any information contained therein**, including your CV, cover letter and certificates; other documentation about your previous work experience, education or similar; and pictures.
- **Information about your employment history and work related experiences and abilities**, including hire date; termination date and reason; employment status; current level of remuneration; any other supporting data submitted by candidates or employees; information obtained during reference checks; previous job applications; evidence of skills/qualifications; and relocation information.
- **Information relating to character and job interests**, including work-related and personal interests; knowledge or skills; and awards or memberships.

- **Other personal data you provide during the recruitment process**, including our notes from interviews with you or with other about you; and all correspondence you have with us or a recruitment agency during the application process.
- **Information on your work authorization status.**
- **Sensitive Data**, in certain circumstance, including your racial or ethnic origin; trade union membership; religious beliefs; or information concerning your health, such as information about a disability for which the Company needs to make reasonable adjustments during the recruitment process.

We may also obtain the above data about you from other sources, including recruitment agencies, the references you provide, websites and other publicly available information on the Internet. This includes, for example, Personal Data that you have made public in the context of an online profile. We may also receive information that you submit to us through third-party websites, such as LinkedIn.

5. Purposes for Data Processing

The Company Processes Personal Data of job applicants for various business purposes that are necessary:

- **For carrying out your recruitment process**, including to process your application; to evaluate your aptitude for the job opening in regard to capabilities and qualifications; to conduct reference checks as allowed or demanded by local laws; to respond to your inquiries; and to communicate with you and to structure the recruitment process based on your needs, *e.g. in regard to possible health issues*.
- **To carry out the employment relationship**, including in regard to HR and performance management upon hire.
- **For the purposes of business process execution and internal management**, including for equal opportunity monitoring and ensuring a disabled-accessible workplace.
- **For IT security and data breach procedures**;
- **For compliance with legal obligations** including tax regulation; and in relation to obligations addressed to employers in relation to the work relationship such as confirming the applicant ´s eligibility to work in the respective country of the Company;
- **For business process optimization**, including to improve our application process or to optimize other recruitment processes or diversity programs.
- **For the assertion and defense of legal claims**.

6. Legal Basis for Processing Personal Data

The Company Processes Personal Data of its job applicants based on multiple different legal bases:

- Once you have been informed about the intended Processing of your Personal Data and you have provided your consent This may include foremost your consent to the Processing of your Personal Data by us for future recruitment activities, such as your inclusion in our internal Talent Pool. The scope of Processing is then determined by the content of the respective consent. You may withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on your consent before the withdrawal. Article 6 GDPR.
- If the Processing of your Personal Data is necessary in order to carry out the contractual relationship between you and us, which might include a pre-contractual employment relationship. Article 6 GDPR.

- If the Processing is necessary for the Company to comply with a legal obligation. *E.g.*, a *court orders the release of certain information for legal proceedings)*. Article 6 GDPR.
- If the Processing is necessary for purposes of the legitimate interests pursued by the Company or by a third party, except where overridden by your interests or fundamental rights and freedoms which require protection of Personal Data. These legitimate interests can include:
    - **Management of the recruitment process**, including to enable the recruitment process; assessment and confirmation of suitable candidates for employment; and towards the procurement of a suitable recruitment strategy and corresponding implementation.
    - **Administrative and management optimization purposes**, including business process execution; internal management optimization; aggregate management reporting or internal training; working climate and equal opportunities monitoring.
    - **The procurement of evidence for legal proceedings**, including the defence against legal claims asserted against us; the assertion of our legal claims; and prevention of compliance or other legal violations.

- In accordance with Article 9 paragraphs 2 or 4 GDPR regarding Sensitive Data.

7. Your Rights

The GDPR provides you with rights relating to the Processing of your Personal Data. These rights include:

- Request access to Personal Data about you (commonly known as a "data subject access request"). This enables you to receive information about the Personal Data we hold about you and to check that we are lawfully Processing it.
- Request rectification, correction, or updates to Personal Data that we hold about you. This enables you to correct any incomplete or inaccurate information.
- Request Personal Data to be transferred in machine-readable format ("data portability") to the extent this right is relevant in the employment context.
- Request erasure of Personal Data. This enables you to request deletion or the removal of Personal Data where there is no legitimate reason for us to continue to Process it. You also have the right to ask us to delete or remove Personal Data where you have exercised your right to object to Processing (see below).
- Request the restriction of Processing of your Personal Data. This enables you to ask us to suspend the Processing of Personal Data about you if you want us to establish its accuracy or the reason for Processing it.
- Withdraw consent you have given at any time without affecting the lawfulness of processing based on consent before its withdrawal.

These rights are not absolute and are subject to various conditions under Data Protection Law and any other applicable laws and regulations.

You may exercise these rights by contacting your Privacy Lead (see Section 3). You also have the right to lodge a complaint with a Supervisory Authority. (**Garante della privacy)**

8. Data Sharing and International Data Transfers: Intra-Group and External Third Parties

Intra-group transfers

As a member of a multinational enterprise operating under a decentralized management structure, the Company **may** share Personal Data of job applicants with other IDEX affiliates/BUs listed here**,** for the purposes set out in this Notice. **Please note that the Company only shares Personal Data of job applicants with those companies where this is covered by a lawful basis for such Processing.**

These transfers are protected by the obligations set out in intra-group agreements that we have entered into between the various IDEX legal entities. International transfers within the IDEX are governed by EU Commission-approved Standard Contractual Clauses for Data Controllers and, where relevant, for Data Processors. You may receive a copy of these Standard Contractual Clauses used in our intra-group agreements by contacting and requesting same from the Company.

External Third Parties

The Company may share Personal Data with external vendors whom we engage to perform services or functions on our behalf and under our instructions. Where applicable, their Processing of your Personal Data will be subject to the GDPR requirements. The Company will also ensure that its contracts with these parties ensure they only Process Personal Data in accordance with our instructions and in order to provide the agreed services and protect the integrity and confidentiality of the Personal Data entrusted to them, in line with the GDPR requirements.

For the purposes set out in this Notice, we may also disclose your Personal Data to our IT service providers, auditors, lawyers, consultants, law enforcement, courts and tribunals and other public authorities, such as tax and social security bodies. Some of these recipients are themselves responsible to determine the purposes and means of the Processing and for the lawfulness of the Processing on their end. Where necessary, we will ensure that appropriate contractual measures are in place to ensure the protection of your Personal Data.

Some of the third parties we engage to Process your Personal Data are located outside the European Economic Area. We will ensure that these transfers are either:

- To countries, which fall under an adequacy decision by the EU-Commission and is deemed to provide an adequate level of protection, currently including Switzerland, Uruguay, Argentina, Japan, Israel, Isle of Man, New Zealand, Guernsey, Canada, Andorra, Faroe Islands and Jersey; or are

- Governed by one of the following safeguards: EU Commission-approved Standard Contractual Clauses, GDPR-compliant Data Processor clauses where the US vendor is certified under the EU-US Privacy Shield Framework or Binding Corporate Rules approved by an EU data protection authority. You may receive a copy of these data protection safeguards by contacting us at the contact details given in Section 3above.

9. Retention of Personal Data

The Company will keep and Process your Personal Data only for as long as is necessary for the purposes for which it was collected or for legal obligations. Such legal obligations may arise particularly

under tax and commercial law. If your data is no longer necessary for the fulfilment of contractual or legal obligations, it will be deleted; unless it is needed to secure, assert or enforce legal claims. In this case, we will retain the date in accordance with the regular limitation period. During this period, this data is blocked and is no longer available for any other use.

In general, application data will be deleted twelve months after the application proceeding has ended at the latest.

10. Statutory/Contractual Requirements

You may choose to not provide us with your Personal Data and/or provide incomplete Personal Data. However, please be aware that, in certain cases, we may not be able to proceed with your application process as your Personal Data may be required for administrative purposes and/or to fulfill statutory requirements.

11. Automated Decision-Making and Profiling

Your Personal Data will not be used for automated decision-making and/or profiling.