

EMPLOYEE PERSONAL DATA PROCESSING NOTICE VIA MEDIAHUB

pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR")

1) DATA CONTROLLER AND CONTACT DETAILS

The Data Controller is **UMBRA GROUP S.p.A.**, with registered office at Via V. Baldaccini, 1 – Z.I. Loc. Paciana, Foligno (PG), Italy, acting through its legal representative in office (the "Controller" or "UMBRA").

For any request relating to the protection of personal data (including the exercise of the rights set out in Section 8 below), UMBRA GROUP may be contacted at the following email address: **privacy@umbragroup.com**.

2) CATEGORIES OF DATA PROCESSED

In connection with the registration for and use of the **MEDIAHUB** portal, UMBRA GROUP processes the following categories of employees' personal data:

- first name and last name (mandatory);
- employee ID number (mandatory only where authentication via corporate email is not used);
- Italian tax code (codice fiscale) (mandatory only where authentication via corporate email is not used);
- personal email address (mandatory for registration purposes, unless access is granted through corporate credentials);
- mobile phone number (optional);
- data relating to the use of the MEDIAHUB portal: access credentials, technical logs, usage preferences, visited areas/sections (in particular access to the "corporate events" section).

The processing of special categories of personal data (e.g., data revealing health status, political opinions, religious beliefs or trade union membership) is neither required nor necessary for the use of MEDIAHUB.

3) PURPOSES AND LEGAL BASIS OF PROCESSING

The processing of personal data via MEDIAHUB for UMBRA GROUP employees pursues the following purposes, in line with those already indicated in the general employee privacy notice:

A) – Publication of corporate documentation supporting work activities:

collection, management and publication of content, communications, articles, presentations, multimedia materials, images or videos, and, more generally, all corporate documentation useful for employees in carrying out their work activities.

Legal basis: consent of the data subject pursuant to Article 6(1)(a) GDPR; consent is expressed through voluntary registration on the MEDIAHUB portal.

B) – Corporate communications and events:

publication, availability and sending of internal corporate communications relating to the employment relationship, welfare initiatives, production activities, corporate events, CRAL initiatives and other corporate initiatives.

Legal basis: consent of the data subject pursuant to Article 6(1)(a) GDPR; consent to receive communications at the email address provided during event registration is expressed through voluntary access to the “corporate events” section of the MEDIAHUB portal.

Registration for and use of MEDIAHUB are voluntary and do not in any way affect the management of the employment relationship or access to other corporate tools necessary for the performance of the employment contract. Failure to provide data for MEDIAHUB solely results in the inability for the employee to use the portal and benefit from its related functionalities.

Processing of data strictly necessary for the technical management of the platform (e.g., security logs, registration records, credential management) may also be based, where applicable, on the Controller’s legitimate interest in ensuring system security and proper service delivery, pursuant to Article 6(1)(f) GDPR, in compliance with the principle of data minimization and following an appropriate balancing of interests.

4) DATA COLLECTION AND PROCESSING METHODS – NATURE OF DATA PROVISION

Registration for MEDIAHUB takes place on a voluntary basis, either through the employee’s completion of the registration form with the required data, or, for personnel using corporate credentials via Microsoft authentication, through automatic recognition of the corporate account, without the need to provide employee ID number or tax code.

The provision of data for MEDIAHUB is optional; failure to provide the data required for registration prevents enrollment in the portal and access to its functionalities, without affecting the employment relationship. Personal data are processed via IT and electronic tools, according to logic strictly related to the purposes indicated above, and by adopting appropriate technical and organizational measures to ensure data security, integrity and confidentiality, as well as protection against unauthorized or unlawful processing, loss, destruction or accidental damage. Such measures include, by way of example, authentication systems, authorization profile management, backup and recovery procedures, and specific instructions provided to authorized personnel.

5) DATA RECIPIENTS AND AUTHORIZED PERSONS

Personal data processed via MEDIAHUB may be made accessible, strictly within the limits necessary for the purposes described above, to:

- employees and collaborators of the Controller, expressly authorized and instructed to process data (e.g., HR, marketing, IT departments);

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Codice Fiscale e Partita IVA 02016930543 - Partita IVA comunitaria IT 02016930543



- third parties providing technical and organizational services related to portal management (e.g., IT service providers, hosting, maintenance, technical support), appointed, where required, as Data Processors pursuant to Article 28 GDPR;
- companies within the UMBRAGROUP group, where necessary for the centralized management of corporate initiatives and in compliance with applicable privacy roles (independent controllers / joint controllers / processors).

Data are not subject to general dissemination, except as may result from the publication of content and images on corporate channels (e.g., website, corporate social media), in line with the stated purposes and the consent provided by the data subject.

6) TRANSFERS TO THIRD COUNTRIES

Personal data processed via MEDIAHUB are not transferred outside the European Economic Area. Should transfers to third countries become necessary in the future, the Controller will provide prior notice to employees by updating this notice and adopting the safeguards provided for under Articles 44–49 GDPR (e.g., adequacy decisions, standard contractual clauses).

7) DATA RETENTION PERIOD

Personal data collected via MEDIAHUB are processed and retained for no longer than is necessary in relation to the purposes for which they are collected, in accordance with the principle of storage limitation.

Specifically, data related to registration for and use of the MEDIAHUB portal are retained until consent is withdrawn by the data subject and, in any case, no later than the termination of the employment relationship with UMBRAGROUP.

In the event of withdrawal of consent or deletion of the MEDIAHUB account, data will be deleted or anonymized, unless further retention is required to comply with legal obligations or to establish, exercise or defend the Controller's rights in legal proceedings, within the limits and timeframes permitted by law.

8) DATA SUBJECTS' RIGHTS

As a data subject, the employee may, at any time, exercise the following rights:

- **Right of access** – the right to obtain confirmation as to whether or not personal data concerning them are being processed and to receive information relating to such processing;
- **Right to rectification** – the right to obtain rectification of inaccurate or incomplete personal data held by the Controller;

- **Right to erasure** – in certain circumstances, the right to obtain deletion of personal data held by the Controller where such data are no longer relevant for the continuation of the employment relationship or required by law;
- **Right to restriction of processing** – under certain conditions, the right to obtain restriction of the processing of personal data, where not relevant for the continuation of the employment relationship or required by law;
- **Right to data portability** – the right to obtain the transfer of personal data held by the Controller to another controller;
- **Right to object** – the right to object at any time, on grounds relating to the data subject's particular situation, to the processing of personal data based on the Controller's legitimate interest or on the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller, including profiling, unless the Controller demonstrates compelling legitimate grounds which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims;
- **Right to withdraw consent** – the right to withdraw consent to the processing of personal data at any time, without affecting the lawfulness of processing based on consent prior to withdrawal;
- **Right to lodge a complaint with the Supervisory Authority** – in accordance with the procedures indicated on the website of the Italian Data Protection Authority (Garante per la protezione dei dati personali). Where UMBRA refuses to comply with access requests, the reasons for such refusal will be provided.

Since the legal basis for processing under purposes A and B is consent, the data subject has the right to withdraw consent at any time, without prejudice to the lawfulness of processing carried out prior to withdrawal. Consent may be withdrawn, for example, by using the specific deletion/unsubscription function available on the MEDIAHUB portal (where applicable), or by sending a written request to the Controller's contact details indicated in this notice, specifying whether the withdrawal concerns purpose A (Publication of corporate documentation supporting work activities), purpose B (Corporate communications and events), or both.

To exercise the above rights, the employee may contact the Controller using the contact details provided in the section "Data Controller and contact details," specifying the subject of the request and the right they intend to exercise.

Requests will be handled without undue delay and, in any case, within one month of receipt, except in cases of particular complexity which may justify an extension, in accordance with the conditions set out in the GDPR.