

MERITOCRACY PRIVACY POLICY

1. What the Privacy Policy is.

This privacy policy (hereinafter "**Privacy Policy**") refers to www.meritocracy.is website, including the areas dedicated and reserved to registered users (hereinafter "**Site**"), and sets forth the personal data processing activities carried out by Coverclip S.r.l. (hereinafter "**Coverclip**") through the Site, which is a property of and is managed by Coverclip. Coverclip acknowledges the importance of its users' privacy and is committed to safeguarding it. Coverclip processes user's personal data when the user enters the Site and/or uses the services and features provided in the Site. The Privacy Policy has been drawn up in compliance with the Personal Data Protection Work Team's Recommendations – Section 29, in relation to the minimum requirements for on-line data collection in the European Union and represents information to data subjects according to Section 13 of Legislative Decree no. 196 of 30 June 2003, as subsequently amended and supplemented (hereinafter "**Privacy Code**"). The Privacy Policy illustrates who the data controller is, that controls and manages personal data collected and processed through the Site, what the collected personal information is, for what purpose, and in what ways personal data are processed, the scope of their disclosure to third parties and their possible transfer abroad, the security measures adopted in order to protect these data, and the manners in which the user can verify his/her data processing, as well as exercising the rights granted by the Privacy Code.

2. How Meritocracy works.

Meritocracy is a technological platform operating through the Internet network and mobile device applications ("**Meritocracy**"), aimed at promoting the crossing of job supply and demand. Through Meritocracy, job seeking users ("**Candidates**") can submit their candidacies by entering their personal data and their work skills and experiences, using the on-line forms available on the Site, and optionally enclosing their personal Curriculum Vitae.

Further information about how Meritocracy works is provided in its **Terms of Use ("ToS")**.

Information entered by the Candidate in the on-line application form and that included in the Curriculum Vitae spontaneously submitted by the Candidate ("**Personal Information**") shall be used by Coverclip for the sole and exclusive purposes described in point 4 below.

At the moment of the Candidate's sign up for Meritocracy, a personal account dedicated to him/her shall be created, where he/she will be able to enter and keep such Personal Information updated as described in the ToS ("**Candidate Account**").

3. What data can be processed: sensitive data and common data.

- 3.1 Personal Information shall include sensitive personal data and non-sensitive personal data, in pursuance of this point of this Privacy Policy. Non-sensitive personal data are the so-called common data ("**Common Data**"), included in the categories referred to in Section 4, paragraph 1, letters b) and c) of the Privacy Code, and generally consisting in natural individual's identifying data such as the name, telephone number, address and work place, email, fiscal code, work experiences, education and related qualifications, etc., with the exclusion of data included in the category referred to in Section 4, paragraph 1, letter d) of the Privacy Code ("**Sensitive Data**"), i.e. those allowing disclosure of racial and ethnic origin, sex life, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as personal data allowing disclosure of health conditions, and those included in the category referred to in Section 4, paragraph 1, letter e) of the Privacy Code ("**Judicial Data**"), i.e. those allowing disclosure of measures referred to in Section 3, paragraph 1, letters a) to o) and r) to u) of Presidential Decree no. 313 of 14 November 2002, concerning the criminal record, the offence-related administrative sanctions register, and the related current charges, or the status of being either defendant or subject of investigations pursuant to Sections 60 and 61 of Criminal Procedure Code.

- 3.2 Except for what is stated in point 3.3., it is recommended to the Candidate not to include Sensitive Data and/or Judicial Data among Personal Information.
- 3.3 Candidates that in exceptional cases, in connection with the particular job opportunity or job search, may have to disclose Sensitive Data and/or Judicial Data to Coverclip according to this Privacy Policy, shall send such data only upon expressed written consent. For this purpose, said Candidates shall download the **Consent Form** for sensitive and/or judicial data processing, print it, sign it, and send it enveloped to Coverclip address in Milan, Via Giuseppe Meda 15, or by email to privacy@meritocracy.is. Lacking this signed consent form, Coverclip shall not process these Sensitive and Judicial Data, and therefore shall not guarantee to provide the services relating to these particular job opportunities or job search services.
- 3.4 In order to carry out the activity of job search and selection, should the need arise to get information that could be considered as Sensitive Data, then the Candidate shall strictly provide such information without detailing them further, and precisely abstaining from disclosing Sensitive Data or Judicial Data (for instance, national service shall be only mentioned as fulfilled or not, with no further details relating to possible moral objections or health, familiar or political motivations; in case of job change, motivations such as pregnancy, injury shall not be mentioned; as to the existence of pending criminal proceedings, it shall be sufficient to state yes or no with no further details, etc.).

4. How Coverclip processes data and purposes of the processing.

Common Data and Sensitive Data processing is carried out both manually and by computer-based and internet tools for the following purposes:

- a) fulfilment of any obligation provided by law, regulations and Community legislation;
- b) carrying out activities relating to search and selection of possible candidates to employ in businesses, firms, companies, professionals that join Meritocracy service or are else partners of Coverclip ("**Firm**" or "**Firms**");
- c) communication relating to possible marketing initiatives connected to Meritocracy;
- d) communication of information about Coverclip activities and events in which Coverclip may take part;
- e) operative management of Site browsing or possible mobile device application browsing, and of the Candidate Account log in data, along with a view to data and portal security.

All communications referred to in letters c), d) and e) above shall be also made through the Candidate Account, and by email, SMS, whatsapp, etc.

Whenever the user enters and browses the Site, typically Coverclip does not collect his/her personal data, except for the so-called browsing data through cookies. To find out more about cookies, please visit our **Cookie Policy**.

Straight-to-Firm data delivery.

The Candidate shall at his/her discretion provide his/her personal data directly to a Firm also through Meritocracy.

In this case, Firms shall be deemed as independent controller and processor of the Candidate's personal data in compliance with their respective privacy policy. It is highly recommended to the Candidate to verify the privacy policy set up by the Firms he/she enters in contact with, also through Meritocracy, as well as to verify whether consent is required or not in connection with processing of certain data categories and the purposes of such processing.

5. To whom personal data can be disclosed. When Candidate's expressed consent is required and the consequences in case of a consent refusal.

- 5.1 Except for compliance with law or judicial order, and whenever the Candidate provides his expressed consent as described in points 5.2 and 5.3 below, Coverclip shall never disclose to third parties, including Firms, Sensitive Data and Judicial Data provided by the Candidate. Under no circumstances shall Personal Information be publicly disclosed unless the Candidate consents to said disclosure.
- 5.2 By accepting this Privacy Policy, Coverclip, in order to provide job search and selection services to the Candidate, shall disclose Personal Information to the Firms. May the Candidate not accept this Privacy Policy, Coverclip shall not provide its job search and selection services, and Meritocracy sign up process and Personal Account creation shall not be completed.
- 5.3 Whenever, in connection with the nature of the job position and career for which the Candidate intends to apply, providing certain personal information that can be included among Sensitive Data or Judicial Data (such as detailed information about health conditions or criminal record) is necessary, the Candidate shall include Sensitive Data and/or Judicial Data among Personal Information. In this case, the Candidate shall send to Coverclip the written Consent Form referred to in Section 3.3 above, expressly authorizing Coverclip to disclose Sensitive Data and Judicial Data to the Firms. Lacking the Candidate's expressed authorization to Coverclip, through said Consent Form, to process and disclose Sensitive and Judicial Data to the Firms, Coverclip shall not be able to provide its job search and selection services or process the related candidacies.

6. Who the Controller of the Candidate's personal data processing is.

The Controller, referred to in Section 4, point 1, letter f) of the Privacy Code, of the Candidate's Common Data and/or Sensitive and Judicial Data processing provided in accordance with this Privacy Policy is Coverclip S.r.l., legal office in Milan, Via Giuseppe Meda 15, email privacy@meritocracy.is.

Whenever the Candidate provides his/her Common Data and/or Sensitive and Judicial Data not only to Coverclip, but also to the Firms, these latter ones shall be deemed as co-controllers of said data processing.

7. Who the Processor of the Candidate's personal data processing is.

The Processor, referred to in Section 29 of the Privacy Code, of Common Data and/or Sensitive and Judicial Data processing provided in accordance with this Privacy Policy is Coverclip S.r.l., legal office in Milan, Via Giuseppe Meda 15, email privacy@meritocracy.is.

Whenever the Candidate provides his/her Common Data and/or Sensitive and Judicial Data not only to Coverclip but also to the Firms, these latter ones shall be deemed as co-processors of said data processing.

8. Who the Persons in charge of the Candidate's personal data processing are.

Coverclip, regardless of the Candidate's expressed consent lack, in order to provide the services connected to Meritocracy, shall communicate this latter one's Common Data and/or Sensitive and Judicial Data to Coverclip employees, collaborators, advisors that may need to know these data in relation to their tasks. These subjects shall therefore be designated by Coverclip as persons in charge of personal data processing in compliance with Section 30 of the Privacy Policy.

9. Territory scope in which the Candidate's personal data are processed.

Candidate's personal data shall be processed by Coverclip within the European Union, also without the Candidate's expressed written consent. Coverclip shall also transfer personal data to Countries outside the European Union, even

without expressed approval, whenever this is necessary for the fulfillment of the obligations relating to Meritocracy service carrying out, in pursuance of Section 43, point 1, letter b) of the Privacy Code.

10. Where the Candidate's personal data are stored.

Coverclip processes and stores personal data with the help of information technology of its own or of third parties, and that are managed either by Coverclip or by third technical services suppliers. Data are only processed by specifically authorised personnel, including the personnel in charge of extraordinary maintenance operations.

11. What security measures Coverclip adopts for personal data processing.

Coverclip is committed to safeguarding Candidate's personal data security and to comply with the security provisions as set up under the applicable regulations, in such a way as to prevent data loss, unlawful or illegal use of the data and unauthorized access to the data, specifically but not limited to Annex B of the Privacy Code (Technical Specifications concerning minimum security measures). Furthermore, information systems and softwares are set up in such a way as to minimise the use of personal data and identifying data, and they are only used by Coverclip when it is necessary in connection with the specific processing purposes pursued. Coverclip makes use of several security advanced technologies and specific procedures in such a way as to protect the users' personal data.

12. What rights the Candidate shall have in relation to his/her personal data.

Pursuant to Section 7 of the Privacy Code, the Candidate shall have the following rights in respect of his/her personal data provided to Coverclip:

1. The Candidate shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of their being already recorded, and communication of such data in an intelligible form.

2. The Candidate shall have the right to be informed:

a) of the source of the personal data;

b) of the purposes and methods of the processing;

c) of the logic applied to the processing when the latter is carried out with the help of electronic tools;

d) of the identifying data concerning data controller, data processors and the representative designated as per Section 5, paragraph 2;

e) of the entities and categories of entities to whom personal data may be disclosed and who may get to know said data in his/her capacity as representative designated in the State's territory, data processor or person in charge of the processing.

3. The Candidate shall have the right to obtain:

a) updating, rectification or, where interested therein, integration of the data;

b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;

c) certification that the operations as per letters a) and b) have been notified, as also related to their contents, to those entities to whom the data have been disclosed or publicized, unless this requirement proves impossible or involves a manifestly disproportionate effort comparing to the right that is to be protected.

4. The Candidate shall have the right to object, in whole or in part:

a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;

b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials, direct selling or else for the performance of market surveys or marketing communication.

For further information about privacy and about the Privacy Code, please visit the site www.garanteprivacy.it

13. How long personal data processing lasts.

Personal data processed by Coverclip are mainly kept for regulatory requirement purposes. In such cases, data keeping period coincides with the longest keeping period that is necessary in relation to one of said purposes.

Currently, it is to be considered that the 10-year keeping time provided by the applicable regulations represents a keeping period reasonably sufficient also for any other purposes.

Sole exceptions to the principle above are to be considered as occurring in case of litigation or, more generally, in case of necessary protection of the company's rights and interests.

In relation to the first exception, data shall continue being kept, with any precaution, only for the time necessary to achieve said purpose.

Once said period has elapsed, therefore, data shall be anonymized in order to ensure data subject's protection and privacy.

In relation to the purpose of protection of Coverclip's rights and interests, it is made clear that data belonging to data subjects who may have exercised processing consent revocation are solely kept for defensive purposes and in the view to retrieving information in case of litigation. Once the time congruous for this purpose has elapsed, such data are anonymized. During this period, these data cannot be used for any other purpose.

13 To whom the Candidate shall address for the exercise of his/her rights concerning personal data.

The Candidate, in order to exercise the rights referred to in Section 12 of this Privacy Policy or for any information concerning his/her personal data provided to Coverclip, shall make a request by sending an email to privacy@meritocracy.is, including in the email his/her name, surname, and the grounds of such request.

14 Amendments

The Privacy Policy is subject to amendments and updates. The version that is currently into force is the one published on the Site, with indication of its last update. Please check out the Privacy Policy periodically in order to keep informed about possible changes.

This Privacy Policy has been updated on 21 September 2015.