

DATA PROTECTION INFORMATION NOTICE

RECORDING OF TELEPHONE CALLS THROUGH THE SWITCHBOARD SERVICE

This data protection information notice aims to describe the methods of handling the personal data of users that may be collected through the assistance services requested by contacting the HR Capital S.r.l. switchboard service – Tel. (+39) 02.365.930.11.

Users are therefore encouraged to carefully read this notice before making any requests via the above-mentioned phone contact.

1. The Data Controller

The data controller for the data collected through the switchboard service, pursuant to European Regulation 2016/679 on the protection of personal data (the "**Regulation**"), is HR Capital S.r.l. (the "**Company**"), with registered office at Galleria San Babila, 4/B, Milan, Tel. (+39) 02.365.93011, Fax (+39) 02.365.930.00, email: info@hrcapital.it, PEC: hrcapital@legalmail.it.

2. The Data Protection Officer

The Data Protection Officer ("**DPO**") can be contacted:

- by email at the following address: dpo@hrcapital.it; or
- by regular mail at the following address: Data Protection Officer c/o HR Capital S.r.l, Galleria San Babila, 4/B, 20122 Milan.

3. Purpose and legal basis of processing carried out in connection with the recording of telephone calls

The personal data collected are those provided by the user when contacting the Company's call center, or those gathered in the context of commercial, technical, contractual, and customer care services with the aid of IT tools.

The data collected by the Company in the context of the above-mentioned services, particularly in relation to the recording of conversations, is processed – in compliance with current data protection regulations, including the Regulation and the Italian Privacy Code – for the following purposes:

- a) to provide the requested services, manage customer relations, and handle any disputes/complaints raised by the user,
- b) to monitor the quality of the services and assess the effectiveness or the need for improvement of the customer support services offered by the Company.

At the beginning of the call, the user will be informed in advance that the conversation with a Company operator may be recorded through a brief informational notice provided by a recorded voice message. If the user does not interrupt the call, this will be considered as consent to the recording.

Therefore, the legal basis for the processing of the user's personal data is the specific consent given by the user.

The Company does not carry out automated processing, including profiling, of the personal data in its possession.

4. Categories of recipients of personal data

The Company will communicate users' personal data only within the limits permitted by law and in accordance with the provisions outlined below. Specifically, the user's personal data may be processed or accessed by:

- employees of the Company, who are authorized and trained to process the data,
- companies that provide specific technical and organizational services related to the call center, as Data Processors under Article 28 of the Regulation,

- law enforcement authorities or judicial authorities, in compliance with the law and upon formal request from them, or in cases where there are valid reasons to believe that disclosing such data is reasonably necessary to: (a) investigate, prevent, or take action regarding suspected illegal activities, or to assist government control and supervisory authorities; (b) defend against any claims or accusations from third parties, or to protect the safety of Company personnel and assets; or (c) exercise or protect the rights, property, or security of the Company, its customers, employees, or any other party.

Personal data will not be disseminated and will not be transferred outside of the European Union.

5. Method of processing personal data and retention period

Any personal data that may be collected through the switchboard are processed using mainly computerized and telematic methods and tools, adopting appropriate security measures and in such a way as to minimize the risks of destruction or loss, even accidental, of the data themselves, of unauthorized access or processing that is not permitted or does not comply with the purposes of collection as indicated in this notice.

Personal data provided by the user in the course of conversation will be retained for a period not exceeding 48 hours. Personal data processed to render a service will be kept for the time strictly necessary to provide the user with the requested service.

6. Mandatory or optional nature of providing data

The provision of personal data collected through the switchboard service is optional, but necessary to manage the quality control of the services provided and, if needed, to formalize, acknowledge, and handle the requests made by the user. If the data is not provided, the Company may be unable to process the user's requests.

7. Rights accorded to the user

The user has the right to:

- access their personal data and obtain confirmation of the existence or non-existence of such data, their communication in an intelligible form, and their integration,
- request the update, correction, or, when relevant, the integration of their personal data,
- request the restriction of processing concerning their data, the deletion, anonymization, or blocking of personal data processed in violation of the law, including data that no longer needs to be stored for the purposes for which it was collected or subsequently processed,
- object, in whole or in part, on legitimate grounds, to the processing of their personal data, even if relevant to the purpose of collection,
- request the transfer of their data to another data controller (so-called right to data portability).

If the processing is based on consent, pursuant to Article 7, paragraph 3 of the Regulation, the user may withdraw their consent at any time, without affecting the lawfulness of processing carried out before the withdrawal.

The above-mentioned rights may be exercised by contacting the DPO at the following address: dpo@hrcapital.it.

8. Right to lodge a complaint

The user has the right to lodge a complaint, pursuant to Article 77 of the Regulation, with the national supervisory authority (in Italy, the Data Protection Authority: www.garanteprivacy.it).

9. Final clause

Considering the current state of development of data protection regulations, it is hereby stated that this privacy notice may be subject to updates.