

Privacy Policy for “Employees”



1. Data Controller

STEMIN S.p.A., with registered offices at Via Guglielmo Marconi, 67 24040 – Comun Nuovo (BG), Tax ID Code and VAT reg. no. 02681790164, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



2. Data processed, purposes and legal grounds for processing

The employee’s personal data, as well as that of their family members, is collected and processed for the following purposes:

- for potential hiring, where employment has not already occurred;
- for the processing and payment of wages;
- for the fulfillment of all procedures required by current legislation on Occupational Health and Safety, Privacy, and Environmental regulations;
- for the fulfillment of legal and contractual obligations, including collective agreements, related to the employment relationship;
- solely for internal company communications (e.g., in addition to traditional noticeboard postings).

Such data will be processed in accordance with the principles of fairness, lawfulness, transparency, and the protection of your privacy and rights.

In connection with the employment relationship, the company may process data considered “special categories of data” under the law, as they may reveal, for example:

- general health status (e.g., absences due to illness, maternity, injury, or mandatory employment placement), fitness or unfitness for certain job duties (as determined by occupational health

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ISO 14064-1
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physicians through required medical examinations, either pre-employment, periodic, or requested by you);

- trade union membership (e.g., holding positions and/or requesting deductions for union membership fees), political affiliation or holding of public elective offices (e.g., leave or special permissions), and religious beliefs (e.g., legal entitlement to observe religious holidays).

Sensitive data concerning health, which is processed by the company's occupational physician in fulfilling duties required by Legislative Decree 81/08 and other workplace health and safety regulations, during pre-employment and periodic health checks, will be processed exclusively by the physician as an independent data controller. In this regard, the Data Controller requests your explicit consent.

Only fitness or unfitness assessments will be communicated by the physician to the employer.

The legal bases for the processing of data are:

- the execution of obligations arising from an employment contract (e.g., data processing for payroll purposes) or of pre-contractual measures taken at your request;
- the fulfillment of legal obligations (e.g., data processing for tax calculations or adjustments);
- the legitimate interest of the employer (e.g., internal communication in addition to noticeboard postings, prevention of damage or loss, or improvement of business productivity).



3. Nature of provision

The provision of personal data is mandatory for all requirements arising from legal and contractual obligations. Therefore, any refusal to provide such data, in whole or in part, may result in the Data Controller being unable to execute the employment contract or to properly fulfill all related obligations, such as those concerning remuneration, social security contributions, taxation, and insurance associated with the employment relationship.



4. Processing locations and methods and data retention times

The collected data is processed at the Data Controller's headquarters.

The data is also stored at the data centers of Microsoft's advanced cloud service provider, including services such as email, calendars, etc. Specific information regarding Microsoft's compliance with EU

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Regulation 2016/679 (General Data Protection Regulation – GDPR) is available at the following link:
<https://www.microsoft.com/it-it/trust-center/privacy/gdpr-overview>.

The collected data will be processed using electronic or otherwise automated, IT, and telematic tools, or by manual processing methods, with logic strictly related to the purposes for which the personal data was collected, and in any case in a way that ensures the security of the data.

The data provided will be stored, in accordance with the “storage limitation principle” (Article 5, EU Regulation 2016/679), for the entire duration of the employment relationship and, subsequently, within the limits required for the fulfillment of legal obligations, except in cases of delayed payment of compensation that may justify extended retention.

A review of the relevance and necessity of stored data in relation to the purposes for which it was collected is conducted periodically. In any case, the Data Controller applies rules that prevent the indefinite storage of data and limits the retention period in compliance with the principle of data minimization.



5. Authorised subjects, data processors and data communication

The processing of the collected data is carried out by internal personnel of the Data Controller, specifically designated and authorized for this purpose, in accordance with specific instructions and in compliance with current legislation.

The collected data, to the extent relevant to the purposes of processing and where necessary or instrumental for the achievement of such purposes, may be processed by third parties appointed as Data Processors or, depending on the case, disclosed to all entities required for the proper fulfillment of the purposes outlined in point 2, such as:

- Employment consultants and/or companies specialized in payroll processing, including their employees and collaborators, as authorized persons or external processors;
- Professionals or service companies involved in business administration and management, acting on behalf of our company.

The data is also processed, on behalf of the Data Controller, by professionals and/or companies assigned to carry out technical, development, management, and administrative/accounting activities.

Without prejudice to communications carried out in compliance with legal and contractual obligations, all collected and processed data may be communicated within Italy and transferred abroad solely for the purposes specified above to:

- Public entities (e.g., INPS, INAIL, Provincial Labor Office, Tax Authorities);
- Pension and welfare funds, including private ones;
- Medical practices, in fulfillment of workplace health and safety obligations;

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- Insurance companies and credit institutions;
- Trade unions to which you have given specific authorization;
- Supplementary pension or healthcare funds;
- Business associations to which the company belongs.

The data collected may be provided in the event of a legitimate request, only in cases provided by law, by judicial authorities.

Under no circumstances and for no reason will your data be publicly disclosed.



6. Data transfer to non-EU countries

The collected data will not be transferred abroad.



7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to info@steminspa.it and specifying the content of their request in the subject line.

Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number

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of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

Latest update: 12nd June 2025

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