

**PRIVACY POLICY FOR EXTERNAL CANDIDATES ARTS. 13
and 14 OF REGULATION (EU) 2016/679 ("GDPR")**

1. CONTACT DETAILS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

D A T A C O N T R O L L E R	W Executive España S.L. Registered office: Paseo de la Castellana, 85, 28046, Madrid. Tax Code (CIF): B72971385 E-mail: info@wexecutive.es (hereinafter referred to as " W Executive " or the " Controller ")
------------------------------------	---

2. CATEGORIES OF DATA PROCESSED AND SOURCE OF DATA

2.1. To add your application to our database, W Executive will process the personal data you have provided through the website [www.wexecutive.es] or that is included in the CV that you have sent us (hereinafter referred to as the "**Personal Data**"). Personal Data may fall into the following categories:

- (i) Identifying data: name, surname, date of birth, tax identification number or passport number, address, mobile and/or landline telephone number, email address, and image.
- (ii) Data relating to personal characteristics: place of birth, nationality, interests.
- (iii) Please also be aware that the Company may process "special categories of data" in accordance with Article 9 of the GDPR, when necessary under Article 9, section 2, letter b) of the GDPR, such as data revealing health status, including belonging to protected categories, which may be included in your CV or any additional documentation you have sent to the Company. Certain categories of data may be processed exclusively to evaluate job applications within the scope of a specific placement. In the absence of such hypotheses and the conditions referred to in Article 9 of the GDPR, such data shall not be considered and shall be immediately deleted.
- (iv) Academic and professional data: education, qualifications, academic record, professional experience, data related to your professional profile, and membership of professional associations.

- 2.2. In general, the data will have been obtained from the information you have provided by filling in the form on the website [www.wexecutive.es] or by sending your CV to W Executive by any means.

Additionally, W Executive may process other data collected during interviews with you, including those conducted during a specific recruitment process in which you were a candidate.

Furthermore, W Executive may collect professional information available on your profile on professional social networks, such as LinkedIn.

Finally, provided you have given your consent, W Executive may collect information from previous employers you have mentioned in the information you sent us.

- 2.3. The communication of data to the Controller is necessary for W Executive to carry out its advisory and recruitment activities and to include your application in recruitment processes for which your professional profile may be suitable. Failure to fill in any of the fields on the form available on www.wexecutive.es may prevent your application from being included in the W Executive database.

3. PURPOSE AND LEGAL BASIS FOR PROCESSING

The above-mentioned Personal Data shall be processed by the Controller for the following purposes and on the following legal basis:

- (i) The proper development of the relationship established between you and W Executive as a result of the submission of information using the form available on the W Executive website or your CV through other means, which includes:
- The analysis and preparation of your professional profile based on the information provided, to determine the positions that may be suitable for your profile.
 - The management of your application for inclusion in current or future recruitment processes that may match your characteristics, as well as managing new applications not linked to a specific job posting.
 - The analysis of your professional profile to promote your participation in training courses and to carry out career guidance actions.

The legal basis for processing shall be the proper development of the relationship you maintain with W Executive as a result of the submission of information related to your professional profile using the website form or through any other means.

(ii) Adding to the information you provided to gain a better understanding of your professional profile. To this end, W Executive:

- Will obtain references about your professional profile from your former employers. Will only process your personal data if you provide the contact details of the persons from whom we may request your references or provide such contact details by other means. In this regard, please be aware that before providing personal data of third parties, you agree to inform those individuals of the processing of their data by W Executive for these purposes.

The legal basis for this processing is the consent you have given by explicitly providing us with the contact details of the persons from whom we may request information about your references. Please note that you can revoke your consent at any time.

- W Executive will gather professional information available on your profile on public professional social networks, such as LinkedIn, unless you object to this processing by ticking the box included in this form. We will only collect the data necessary to complete your professional profile and will use this data solely for the above-mentioned purpose.

The legal basis for this processing is the legitimate interest of W Executive in having as much information as possible, exclusively related to your professional profile, to adequately provide the requested services. To this end, please be aware that W Executive has conducted a detailed assessment of the prevalence of these legitimate interests in relation to the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be consulted upon request sent to the email address privacy@wexecutive.es.

In any case, we remind you that you may object to this processing at any time, in particular by expressing such opposition in accordance with the provisions of the rights clause of this policy.

(iii) Any personal data provided by you in relation to special categories of data in accordance with Article 9 of the GDPR will be processed only when necessary and relevant to evaluate your application for positions within the scope of a specific placement.

The legal basis is the need to comply with obligations and exercise specific rights of the data controller or the data subject in the field of employment law and social security and

protection, as authorised by Union or Member State law, and the presence of appropriate safeguards for the fundamental rights and interests of the data subject (Article 9.2(b) GDPR).

- (iv) The communication of your Personal Data to companies involved in recruitment processes you participate in. If W Executive considers you suitable to participate in a recruitment process, we shall inform you and request your authorisation to submit your application. In such a case, W Executive will provide the company concerned with the necessary personal data for your participation in the process.

The legal basis for this communication is the proper application by the recipient of pre-contractual measures aimed at formalising the contract with the company, should you be selected for the position.

- (v) Counsel and defence of the Company's rights and interests before judicial and administrative authorities. W Executive may process your personal data to exercise its right to effective judicial protection in the event of a case brought before a judicial or administrative authority.

The legal basis for processing is the legitimate interest in ensuring the right of W Executive to effective judicial protection. W Executive has conducted a detailed assessment of the balance between these legitimate interests and the adequate protection of your rights and interests, adopting the necessary measures to guarantee them. The result of this assessment can be consulted upon request sent to the email address privacy@wexecutive.es.

- (vi) The compliance of W Executive with its legal obligations and the communication of personal data in those cases in which such data are requested by a judicial or administrative authority empowered by law to request them.

The legal basis for this processing is the compliance of W Executive with a legal obligation.

- (vii) The communication of your Personal Data to other companies within the W Group Holding S.p.A., of which W Executive is a part, for the provision of services of the same nature as those you have requested by submitting your CV or completing the W Executive web form. This communication shall only occur if you have given your explicit consent by ticking the relevant box at the end of this form, with such consent being the legal basis for the processing. You can view the group companies at the following link: [W Group \(w-group.it\)](http://W Group (w-group.it)).

4. RETENTION

In general, W Executive will process your personal data for as long as you wish to receive advisory, training, and recruitment services.

However, as the information related to your professional profile may become outdated over time, W Executive will request an update of your professional information every three years in order to continue providing you with the appropriate services. If you do not update your information, W Executive will consider the data to be no longer adequate for the provision of its service and will delete them.

This deletion means that your personal data will be blocked for the period necessary for the exercise or defence against administrative or judicial actions or the fulfilment of legal obligations that the Company may be subject to. The data shall only be unblocked and processed again for these reasons. Once this period is over, the data will be permanently deleted from our systems.

When W Executive processes your personal data for the defence of the Company's interests in administrative or judicial proceedings, the data will be retained until the final resolution of those proceedings. At the end of that period, the data will be blocked for the three years stipulated by data protection regulations.

5. RECIPIENTS

5.1. Personal Data may be communicated, to fulfil obligations and improve the management of the Controller and the group to which it belongs, to the following entities:

- (i) Companies in whose recruitment processes you may participate, as indicated in point (iii) of section 3 of this privacy policy.
- (ii) Public Administrations that may request them in compliance with applicable legal provisions.
- (iii) Public administrations that request them as part of an inspection process or an administrative procedure.
- (iv) Judicial and administrative bodies when necessary as part of a case brought before them based on the legitimate interest of the Company in guaranteeing its right to effective judicial protection.
- (v) Group companies when you have given us your consent, as indicated in point (vi) of section 3 of this privacy policy.

5.2. Furthermore, your data may be accessed on behalf of and in the name of W Executive by service providers designated as data processors or by persons authorised

to process data. In these cases, W Executive undertakes to ensure the security of your data and to sign the corresponding data processing agreement with these providers, as established in personal data protection regulations.

6. LOCATION AND TRANSFER OF DATA

- 6.1. For the processing of personal data, W Executive S.r.l. uses an IT infrastructure located within the European Union.
- 6.2. Personal data of the data subjects may be transferred to service providers located outside the European Economic Area, resulting in an international transfer of your data. As such, W Executive has adequate safeguards in place in accordance with data protection regulations, such as the signing of Standard Contractual Clauses, including the corresponding transfer impact assessment. You can obtain a copy of these safeguards from the Data Protection Officer.

7. RIGHTS OF THE DATA SUBJECT

You have the right to access your personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected or you withdraw your consent to the processing, when the data were necessary for these purposes.

In certain circumstances, you may also request the limitation of the processing of your data, in which case they shall only be retained for the exercise or defence of claims. Similarly, you can object to W Executive accessing information that may be posted or associated with your profile on professional social networks, such as LinkedIn.

Furthermore, when the processing is based on the fulfilment of a task carried out in the public interest or to satisfy the legitimate interests of the Company, and for reasons related to your particular situation, you may object to the processing of your data. The Company will stop processing the data, except in those cases in which it is necessary to continue with the processing for legitimate reasons, or for the exercise or defence of possible claims.

You may exercise these rights by sending a written request to the Controller, to the postal address indicated above or to the e-mail address privacy@wexecutive.eu.

You also have the right to lodge a complaint with the Spanish Data Protection Agency via its website www.aepd.es.

DECLARATION THAT YOU HAVE READ THE INFORMATION

I declare that I have received and read the information about the processing of my personal data. In _____, on / / ____

Legible First Name and Surname _____

Signature _____

CONSENT OR OBJECTION TO THE PROCESSING OF PERSONAL DATA

- By ticking this box, I give my consent for W Executive to request from my previous employers, whose contact details I attach, the information relevant to the preparation of my professional profile.

- I consent to W Executive communicating my personal data to the entities within the group in order to receive notifications about services offered by W Group Holding S.P.A.