

## PRIVACY POLICY reload S.r.l

(reload) pursuant to art. 13 of EU Reg. 2016/679 (GDPR) provides information on the processing of personal data (Policy) carried out by this website (Site) to those who interact with the Site by consulting or using any services. Users must consult this Policy before communicating any data to reload.

This information is not provided for other websites that may be consulted by the user through links.

The services provided by the Site are intended only for persons over 18 years of age, therefore, if reload discovers that the data have been sent by a minor, it will delete the data. The data controller is reload S.r.l. (PI/CF 08533910967) with registered office in C.so Indipendenza n. 5 -20129 Milan

e-mail: [marketing@reload.it](mailto:marketing@reload.it)

**1.Navigation data:** during their normal operation, the computer systems and software procedures used to operate the Site may acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data may include IP addresses or the domain names of the computers used by users connecting to the Website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data may be used to obtain anonymous statistical information on the use of the Site and to check that it is functioning correctly, and is deleted shortly after processing.

The data could be used to ascertain responsibility in case of possible computer crimes against the Site and reload, except for this possibility, the data on web contacts are not generally stored for more than 20 days. Please refer to what is specified in the following sections of the Policy.

**2. Data provided voluntarily:** when using certain services on the Site the user may send data from third parties.

In these cases, the user acts as an independent data controller, assuming the obligations and responsibilities provided for by law, and is therefore required to: 1) ensure that the processing is based on one of the legal bases provided for in Article 6 of the GDPR; 2) indemnify reload in the event of a dispute or claim for damages from data processing by third parties whose data has been processed by the user using the functions of the Site in violation of data protection regulations. Data (name, address, contact details, etc.) shared voluntarily, e.g. in a request sent by email to the addresses indicated on the Site, are processed to respond to user requests.

The legal basis of the processing is Article 6 par. 1 let. b) of the GDPR since the processing is necessary to provide services and/or to respond to user requests (performance of pre-contractual and/or contractual services).

The user is required to communicate only the strictly necessary data. Providing data for these purposes is optional, and failure to do so will make it impossible to activate the services requested. If the user provides his/her data falling into "special categories of data" (art. 9 of the GDPR: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation), he/she must communicate such data only if strictly necessary. It should be noted that in the event of communication of special categories of data but in the absence of an explicit manifestation of consent to process such data (an eventuality which, however, obviously allows you to send a curriculum vitae), reload cannot be held liable in any way, nor can it receive any objection, since in this case the processing will be permitted insofar as it relates to data made manifestly public by the data subject (Article 9(2)(e) of the GDPR).

In any event, we stress the importance of your express consent to the processing of special categories of data if you decide to communicate them. Data are stored for 1 year. Please refer to what is specified in the following sections of the Policy.

**3. Job offers and receipt of curricula:** the data collected through reload's Job Offers and the data contained in the curricula sent to the addresses indicated on the Site are processed to assess the professional profile of the candidates and to arrange possible interviews. Applicants are required to provide only the data that is strictly necessary.

Data processing is based on the execution of pre-contractual measures taken at the request of candidates (Article 6 no. 1 letter b) of the GDPR). In case of transmission of special categories of personal data (art. 9 of the GDPR as described in section 2 above) but in the absence of an explicit consent to process such data reload shall not be held liable or receive any objection since in the aforementioned case the processing will be lawful as it concerns data made manifestly public by the data subject (art. 9 n. 1 lett. e) of the GDPR).

In any case, we stress the importance of expressing explicit consent to the processing of special categories of personal data, should candidates decide to share them. The provision of data is an option for candidates; refusal to provide it means that we cannot assess their profiles. If reload is not interested in the candidate's professional profile, it deletes the data as soon as it is received or at the end of the interview; if, on the other hand, it is interested in the professional profile but no employment relationship is established, it keeps the data for 2 years in order to be able to contact the candidates in the future for other possible job interviews. This retention period is based on the legitimate interest of reload to be able to contact candidates whose job profiles it considers interesting (Art. 6 no. 1 letter f) GDPR). Please refer to what is specified in the following sections of the Policy.

**4. Cookies:** cookies are data files that websites send to users' internet access devices (generally browsers) where they are stored and retransmitted to the same sites the next time users visit.

Cookies can be: 1) technical (guaranteeing the usability of the sites, allowing the user to select navigation parameters and log in); 2) profiling (used to send promotional messages based on the preferences expressed by the users on the navigation choices); 3) third party (not installed by the sites that users to visit but by third party sites that install them through the former). Cookies may disappear when the browser is closed (session cookies) or remain on users' devices until they expire (persistent cookies).

Users can always choose which cookies to allow on their devices through the configurations of their browsers:

<https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>  
<https://support.mozilla.org/it/kb/Attivare%2520e%2520disattivare%2520i%2520cookie>  
<https://support.google.com/chrome/answer/95647?hl=it&topic=14666&ctx=topic>  
<https://www.opera.com/help/tutorials/security/privacy/>  
<https://support.apple.com/it-it/guide/safari/sfri11471/mac>

If technical cookies are disabled, users of a site may find it difficult to consult the site or some of the site's services may not be available. Users' consent is not required for the use of technical cookies as these cookies are used to carry out the transmission of a communication over an electronic communication network or to provide a service requested by the user.

The reload website uses Google Analytics cookies that provide reload with aggregate and anonymous reports on how often users visit the website, how long they stay on the website, etc.. Google acts as a data processor through the aforementioned system.

Users can consult the privacy policy of Google Inc., relating to the Google Analytics service, at the link <https://policies.google.com/technologies/cookies> to refuse the use of Google Analytics cookies, as indicated on Google's website at the link <https://support.google.com/analytics/answer/181881?hl=it>, they must change the configuration of their browsers by downloading the add-on for deactivating Google Analytics JavaScript at the link <https://support.google.com/analytics/answer/181881?hl=it>.

Disabling Google Analytics cookies only prevents reload from performing the aforementioned aggregate and anonymous statistics (IP addresses are, in fact, anonymized and masked). N.B. reload does not need to ask for your consent for the use of Google Analytics cookies as described, as these are included in the category of technical cookies. Please refer to the following sections.

**5. Data recipients.** Users' data may be shared with: 1) subjects with whom it is necessary to interact in order to provide the services (e.g. hosting providers); 2) subjects, bodies or authorities, independent data controllers, to whom it is mandatory to communicate users' data under the law or orders of the authorities; 3) persons authorised to process the data pursuant to art. 29 of the GDPR necessary to perform activities related to the provision of the services provided (e.g. reload staff).

**6. Data transfer to non-EU countries.** Data may be transferred to non-EU countries (e.g. the United States) under standard contractual clauses which are standard contractual conditions provided by the European Commission that can be used to transfer data outside the European Economic Area in a GDPR-compliant manner.

**7. Data retention.** The data are processed for the time necessary to fulfil contractual and legal obligations, and the various storage periods are specified in the specific information.

**8. Users' rights.** Pursuant to Articles 15 et seq. of the GDPR, users have the right to request at any time, access to their data, rectification or deletion of the same, restriction of processing in the cases provided for by Article 18 of the GDPR, obtain their data in a structured, commonly used and machine-readable format, in the cases provided for by Article. 20 of the GDPR, to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali) pursuant to art. 77 of the GDPR, if they consider that the processing of their data is contrary to the law, to formulate a reasoned request to object to the processing of their data pursuant to art. 21 of the GDPR. reload reserves the right to evaluate the requests which would not be accepted in the event of the existence of compelling legitimate grounds to proceed with the processing which prevail over the interests, rights and freedoms of the users. Requests should be addressed in writing by e-mail to reload.

**9. Changes.** reload reserves the right to change the content of this privacy policy, also due to changes in the law, and invites users to read it periodically in order to be updated on the data collected and its use by reload.