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## DATA PROTECTION NOTICE Cargolux Italia notice for Pilots Candidates

Cargolux Italia S.p.A. (hereinafter “**C8**”, “**company**”, “**we**” or “**us**”) as an employer is committed to protect personal data of its employees and to comply with the Reg. 2016/679 (also “**GDPR**”) which requires to inform the data subject of the personal data processing that are carried out on their personal data. Therefore, this document is issued in favor of candidates applying for a pilot position in C8 (hereinafter “**data subject**”, “**employee**”, or “**you**”) and aims to:

- provide information about how C8 processes your personal data during the selection and training procedures;
- inform you of your rights and obligations in respect to data protection; and
- provide information on how to raise questions or comments that you may have.

<u>What is a controller and who is the controller of your data as candidate for a pilot position in C8?</u>	A data controller is a company that is responsible for deciding how to collect, hold, and use your personal data. In the recruitment process, C8 is the controller.
<u>Which one of your personal data we collect and use?</u>	<p><u>Common personal data</u></p> <p><b>Identification data:</b> name, date and place of birth, nationality, ID, and passport information, contact details, address, telephone, email, Country, or other contact information.</p> <p><b>Job application data:</b> application form, Curriculum Vitae, cover letter, previous work experiences, career gaps with supporting documents, education, training certificates, additional qualification, logbook, or other information regarding your professional qualification and experience, additional skills and abilities, professional interest, details of your rights to work in the concerned countries, type of employment sought, desired salary, job preferences, etc.</p> <p><b>Qualification data:</b> level of formal qualification, licenses and medical certificates data, language skills, test and assessment results data, certificate of conduct.</p> <p><b>Content data:</b> text submissions, images, videos.</p> <p><b>Results of our recruitment process:</b> such as your performance during assessment center, psychometric data (e.g., aptitude test results), interview, simulator screening and information provided by your referees for selection process.</p> <p><b>Names and contact details of referees.</b> Prior to providing personal data of any data subjects, you must inform them about the content of this</p>



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	note and ensure that they do not object to the processing of their personal data by C8.
	<u>Special category of data</u>
	<b>Health data:</b> Including pilot psychological assessments and other health data needed to assess your working capacity.
	<u>Criminal convictions and offences</u>
	Criminal records.

<u>Why do we collect the above-mentioned data? And on what legal basis we process them?</u>	<p>The processing of your personal data is necessary for taking <b>pre-contractual measures necessary for the recruiting process, assess job applications and candidates, and to decide whether C8 intends to enter into an employment agreement with you.</b></p> <p>The processing of your health data is necessary for <b>assessing your working capacity.</b></p> <p>The processing of your personal data is necessary for the <b>compliance with a legal obligation in the fields of aeronautical, tax, corporate, and/or labor law.</b></p> <p>The processing of your personal data is necessary for the purposes of the <b>legitimate interests pursued by C8.</b> In particular, with reference to correctly managing our recruitment processes, preventing conflict of interests, protecting C8 in case of investigations, and ensuring IT and information security.</p>
<u>Information on third parties to which we share your personal data</u>	<p>C8 may communicate on a need-to-know basis your personal data to:</p> <ul style="list-style-type: none"> <li>• Members of C8 and Cargolux Airlines International SA.</li> <li>• Local public authorities, law enforcement entities, or other government and regulatory entities, upon request and to the extent permitted by law.</li> <li>• Third parties providing products &amp; services to C8 necessary to conduct the recruitment process (incl. IT software/application &amp; service providers, consultants, etc.).</li> <li>• Regulated professionals, where necessary and in accordance with applicable laws and</li> </ul>



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	regulations (incl. lawyers, external auditors, occupational health professionals, etc.).
<u>International data transfers</u>	For the recruitment process, C8 process your personal data within the territory of the Economic European Area. In case of international transfers to a country outside the EU/EEA, the transfer may occur where the European Commission has decided that the receiving country ensures an adequate level of data protection. For transfers to countries for which the level of protection has not been recognized as adequate by the European Commission, we will implement appropriate safeguards provided for by data protection law (e.g., entry into standard data protection clauses) or rely on a derogation applicable to specific situations.
<u>How do we protect your data?</u>	To ensure the safety and security of Your personal data, C8 gives access to personal data within our company on a need-to-know basis. This means that personal data should only be accessed to those who need such personal data for the purposes pursued in the scope of their role and within the limits imposed by the laws. In addition, C8 implemented information security measures to protect its and your data.
<u>For how long we keep your data?</u>	Unless a longer retention period is required by applicable laws or to pursue the purposes mentioned in the section " <i>Why we collect the above-mentioned data?</i> " (e.g., as necessary to defend our rights in the scope of investigations, disputes, or legal claims), we will retain your personal data for 2 years upon conclusion of the relevant or latest step of the selection process. At the end of that period, or once you opposed to your personal data being processed, your personal data will be anonymized, deleted, or destroyed.

**AT THE FOLLOWING PAGE YOU FIND A DESCRIPTION OF YOUR RIGHTS UNDER GDPR THAT YOU MAY EXERCISE AT ANY TIME BUT MAY BE SUBJECTED TO CONDITIONS OR RESTRICTIONS PROVIDED IN THE REGULATIONS AND IN THE FOLLOWING SECTION:**



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## WHAT ABOUT YOUR RIGHTS?

<b><u>Right to withdraw</u></b>	If the processing of your data is based on your consent, you can withdraw it at any time. You do not need to give a reason. A decision to withdraw consent will not affect you in any way.
<b><u>Right of access</u></b>	You can: <b>(1)</b> ask a confirmation as to whether C8 is using, storing, or otherwise processing your personal data and C8 shall provide specific information on the ongoing processing and <b>(2)</b> request information on the legal basis under which personal data is transferred outside of the EEA.
<b><u>Right of rectification</u></b>	You can ask us <b>(1)</b> to rectify inaccurate data concerning you or <b>(2)</b> to complete incomplete personal data processed by C8.
<b><u>Right of erasure</u></b>	You can ask to erase personal data if it is no longer necessary in relation to the purposes for which it was collected or processed or if other conditions occur.
<b><u>Right to restriction</u></b>	You can ask to restrict processing in specific circumstances: <b>(1)</b> you believe the personal data we have of You is inaccurate, <b>(2)</b> you believe the personal data processing is unlawful, <b>(3)</b> we no longer need the data but You require the data for the exercise of legal claims, or <b>(4)</b> you have objected to the processing of Your data and are awaiting the outcome of this objection.
<b><u>Data portability</u></b>	You have the right to receive your personal data in a structured, commonly used, and machine-readable format and the right to ask us to transmit some of your data to another organization.

**In addition, please note that you have the following rights:**

<b><u>Right to object</u></b>	You can object to certain processing: <b>(1)</b> objecting processing of your personal data for direct marketing purposes, <b>(2)</b> challenging which has been justified on the basis of our legitimate interests or in the public interest, and <b>(3)</b> objecting to decisions based solely on automated processing, including profiling. However, we might continue the processing where we can demonstrate an overriding interest, or where we need the data for the establishment, exercise, or defense of legal claims.
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**And you have THE RIGHTS TO FILE A COMPLAINT to a supervisory authority, in Italy:**

***Garante per la protezione dei dati***

<https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>

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<b><u>Who to contact for question or doubts?</u></b>	If you have any question concerning this notice or if you wish to exercise your rights as a data subject, you can contact the C8 Legal & Compliance at <a href="mailto:dataprotection@cargolux-italia.com">dataprotection@cargolux-italia.com</a>
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16<sup>th</sup> of January 2025

**[End of the notice]**