

# PRIVACY POLICY

# Pursuant to art. 13 of Regulation (EU) 679/2016, concerning the protection of natural persons with regard to the processing of Personal Data (hereinafter "GDPR")

With reference to the European Union regulation 679/2016, hereinafter "GDPR", especially to art. 13, we hereby supply you all due information concerning the processing of your personal data.

## What data do we process? (art. 13, 1 paragraph, letter a, art. 15, letter b, GDPR)

The website www.horix.ch is owned by Horix Aerospace Ltd, which is based in Via Luserte 4, 6572 Quartino, Switzerland, and is the processor of data, such as:

Data entered by filling out the registration form (name, surname, tax code, birth city and date, address and email address, telephone and mobile number, data regarding your career path or that information you disclosed in your resume as well as regarding your health condition;

Data concerning the navigation on our website, ex. traffic related data, location, website visits, weblog, IP address, the operating system and the browser used, cookies;

Data you supply us via email, survey as well as via our contact modules.

# Why do we need your data? (art. 13, 1 paragraph, letter c, d, e, f, GDPR)

We use your data to accomplish your placement as well as the GDPR. Your data are specifically processed for:

1. The activities concerning the intermediation between labour supply and demand, the search and selection of personnel, outplacement as well as training.

The legal basis of such activities is the accomplishment of pre-contractual and contractual requirements in which you take part as well as the compliance with the law. 2. The activities aimed to optimize the services outlined at point 1), which are delivered both online and offline by the owner.

The legal basis of such activities is the accomplishment of pre-contractual and contractual requirements in which you take part as well as the owner's legitimate interest.

The activities with commercial purposes, the sending of information, newsletters, surveys as well as of messages from the customer service.

The legal basis of such activities is your consent to the processing of your data, which you are allowed to revoke at any time.

The sharing of your data with our clients who are in search of personnel as well as with those public and private subjects by which the owner was charged of one of the activities mentioned at point 1). In addition to that, your data are transmitted to the organizations and private individuals supporting the owner with the delivery of services, such as network services, software, advertising, etc.). At last your data can be transmitted through the owner's website or some other staffing services only with the purpose of accomplishing the service related contractual requirements at any time. The legal basis of such activities is the accomplishment of pre-contractual and contractual requirements related to the service as well as the existence of specific legal obligations.

## What happens if you do not supply us your data? (art. 13, 2 paragraph, letter e, GDPR)

The collection and processing of your personal data is necessary to fulfill the service requests as well as to perform the Service and/or supply the requested Product. Should you fail to provide your personal data as expressly required within the order form or the registration form, the Data Controller will not be able to carry out the processing associated with managing the requested services and/or the contract and the Services/Products associated with them, nor fulfill the operations dependent on them.

## What happens when you do not provide the consent for processing personal data for the business promotion activities on Services/Products that are different from those purchased?

When you do not give your consent to the processing of your personal data for these purposes, the processing will not be implemented for these specific purposes, but it will not affect the performance of the requested services or those for which you have already given your consent, if requested.

In the event you have given consent and later withdraw it or oppose the processing for business promotional activities, your data will no longer be processed for these activities, although this will not create negative effects or consequences for you or the services requested.

## How we process your data (Article 32, GDPR)

The Controller makes use of appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, and requires the same security measures from third party providers and the Processors.

## Where we process your data

Your data is stored in hard copy, electronic and remote archives located in countries where the GDPR is applicable (EU countries).

### How long is your data stored? (Article 13, paragraph 2 (a) GDPR)

Unless you explicitly express your own desire to remove it, your personal data will be stored until required for the due purposes for which it was collected.

In particular, the data will be stored for the entire duration of your registration and in any case for no longer than a maximum period of 12 (twelve) months of inactivity, that is, within this time period, there have been no Services and/or Products purchased using this registration.

For data provided to the Controller for the purposes of business promotion for services other than those you have already purchased, for which you initially gave consent, it will be stored for 24months, except when such consent is withdrawn.

For data provided to the Controller for the purposes of profiling, it will be stored for 12 months, again except when consent has been withdrawn.

It is also important to add that, should the user forward to Horix Aerospace personal data that has not been requested or that is unnecessary for the purposes of performing the services requested, or for the performance of services strictly connected thereto, Horix Aerospace cannot be considered controller of this data and will proceed to delete it as soon as possible.

Regardless of your determination to remove the data, your personal information will be, in any case, stored according to the terms outlined in current law and/or national regulations, for the exclusive purpose of guaranteeing specific requirements, applicable to certain Services (for example, but not limited to, Certified Electronic Mail, Digital Signature, Digital Preservation - refer to the associated section).

### What are your rights? (Articles 15 - 20 GDPR) You have the right to obtain the following:

a) confirmation on whether your personal data is being processed and if so, to obtain access to your personal data and the following information:

1. the purposes of the processing;

2. the categories of personal data in question;

3. the recipients or categories of recipients that have received or will receive your personal data, in particular if these recipients are in third party countries or are international organizations;

4. when possible, the anticipated storage period of your personal data or, if not possible, the criteria used to determine this period;

5. whether you have the right to ask the Data Controller to correct or delete your personal data or the limits on processing your personal data or to oppose the processing of the data;

6. the right to lodge a complaint with a supervisory authority;

7. in the event the data is not collected from you, all of the information available regarding its origin;

8. whether there is an automated decision process, including profiling, and, at least in these cases, significant information on the logic used, as well as the importance and consequences to you for this processing.

9. the suitable guarantees provided by the third-party country (outside EU) or international organization to protect any transferred data.

b) the right to obtain a copy of the personal data processed, again given that this right does not affect the rights and freedoms of others; for extra copies requested by you, the Data Controller may assign a reasonable fee based on administrative costs.

c) the right to edit any of your incorrect personal data from the Data Controller without unjustified delay

d) the right to have your personal data deleted by the Data Controller without unjustified delay, if there are the reasons outlined in the GDPR, Article 17, including, for example, if the data is no longer needed for processing or if the data is considered illegal, and again, if there are no conditions outlined by law; and in any case, if the processing is not justified by another equally legitimate reason;

e) the right to obtain limits on the processing from the Data Controller, in those cases outlined in Art. 18 of the GDPR, for example where you have disputed the correctness, for the period necessary for the Data Controller to verify the data's accuracy. You must be notified, within an appropriate time, even when the suspension period has passed or the cause of limiting the processing has been eliminated, and therefore the limitation itself has been withdrawn;

f) the right to obtain information from the Data Controller on the recipients who have received the requests for any corrections or deletions or limits on the processing implemented, except when this is impossible or would create a disproportionate effort.

g) the right to receive your personal data in a structured format, commonly used and readable by automatic devices as well as the right to forward this data to another Data Controller without obstruction from the original Data Controller, in those cases outlined by Art. 20 of the GDPR, and the right to obtain direct forwarding of your personal data from one Data Controller to another, if technically feasible.

For further information and to send your request, contact the Data Controller at info@horix.ch To guarantee that the rights noted above are exercised by you and not by unauthorized third parties, the Data Controller may require you to provide other information necessary for this purpose.

#### To whom can you make a compliant? (art. 13, 2 paragraph, letter d, GDPR)

Without prejudice to any other ongoing administrative or judicial action, you may lodge a complaint with the applicable supervisory authority of the Italian territory (Italian Personal Data Protection Authority), that is, with the agency that performs its duties and exercises its rights within the member country where the GDPR violation occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means, and will be notified to you if the Data Controller processes your data for purposes other than those outlined in this privacy policy prior to proceeding and after you have given your consent, if necessary.