



Privacy policy for applicants

This privacy Policy (“**Privacy Policy**”) sets out the procedures followed to collect, store and use the personal data concerning you through the application for the “First Commit” initiative (the “**Event**”) in accordance with the Regulation (EU) 2016/679 (“**GDPR**”) and any other applicable privacy provisions laid down by the European Union, or the member States (collectively, “**Applicable Privacy Laws**”).

I. Data Controller and Data Protection Officer’s contact details

The Data Controller is Bending Spoons S.p.A., based in Via Nino Bonnet 10, Milan, MI 20154 (Italy), VAT 08931860962 (“**Data Controller**”, “**Company**”, or “**we**”). For any requests regarding the processing of your personal data, please email us at privacy@bendingspoons.com.

Our Data Protection Officer can be contacted for any requests relating to the processing of your personal data or this Policy by sending an email to dpo@bendingspoons.com.

II. Categories of the processed personal data, purposes and legal bases for the processing

The Company processes the following categories of Personal Data, for the purposes and on the legal bases indicated below.

Purpose	Legal basis	Categories of data
<p>a. Your personal data is processed for the purpose of assessing your profile, qualifications, and skills, within the framework of our Rules to process your application to the Event and allow you to participate if you are selected.</p> <p>In order to achieve this purpose, given the large number of applications we</p>	<p>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).</p>	<p>Common data: name, surname, email, information relating to your qualifications, skills, academic and professional career.</p>



<p>receive, your personal data contained in your application may be processed using AI technology for the purpose of carrying out a preliminary screening of the relevance of the applicants' profiles. The results of this preliminary screening done with the support of AI will be checked via a human intervention and, if correct, validated by the members of the selection team.</p>		
<p>b. Your personal data may be processed for the purpose of the organization and booking of the transfers and for the accommodation.</p>	<p>Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract (art. 6(1)(b) of the GDPR).</p> <p>You have consented to the processing of your personal data for one or more specific purposes (art. 9(1)(a) of the GDPR).</p>	<p>Common data: name, surname, email, ID card or passport number, information about your selected transport solution and hotel accommodation.</p> <p>Special categories of personal data, only if spontaneously shared by you: data relating to your health, revealing food intolerances or religious beliefs.</p>



<p>c. Your personal data may be processed for the purpose of inviting you to apply for a job position with us if we are interested in your profile.</p>	<p>The pursuit of the legitimate interest of the Data Controller to promote its workplace towards promising students (Article 6, paragraph 1, sub-paragraph f).</p>	<p>Common data: name, surname, email, data relating to your qualifications, skills, academic and professional career, assessments and tests, competences.</p>
<p>d. Your personal data may be processed for the purpose of complying with our legal obligations or other obligations arising out of the instructions received from the competent authorities.</p>	<p>Processing is necessary for compliance with a legal obligation to which the data controller is subject (art. 6(1)(c) of the GDPR).</p>	<p>Common data: name, surname, email, data relating to your qualifications, skills, academic and professional career, assessments and tests, competences, ID card or passport number.</p>
<p>e. For the establishment, exercise, or defense of the rights of the Company and/or its own employees, including in court or before an authority.</p>	<p>The pursuit of the legitimate interest of the Data Controller and/or its own employees in the protection of their own rights (Article 6, paragraph 1, sub-paragraph f) and Article 9, paragraph 2, sub-paragraph f) GDPR).</p>	<p>Any common or personal data that may become necessary in order to establish, exercise, or defend the rights of the Company and/or employees.</p>
<p>f. To use the recording of the Event and create audio and/or visual materials and recordings, and to make them available to the public in any media, for commercial and non-commercial purposes, including advertising, promotion, marketing, and commercialization</p>	<p>The legal basis for the processing is your consent (art. 6(1)(a) of GDPR).</p>	<p>Any personal data related to you in the Recording, which could include common data such as your name, contact information, personal image, appearance, likeness, voice, and other biographical and identification information.</p>



<p>of the Data Controller, its affiliates, and any of their respective products and services, and for any other similar purpose.</p>		
<p>g. Your personal data may be processed for the purpose of improving the organization and promotion of our events, including by conducting surveys and analysis aimed at promoting diversity, greater integration and inclusion.</p>	<p>The legal basis for this processing is our legitimate interest (art. 6(1)(f) GDPR) to improve the organization and promotion of our events.</p> <p>In case special categories of personal data are involved, the processing activities are based on your consent (art. 9(2)(a) GDPR) or on data manifestly made public by the data subject (art. 9(2)(e) GDPR).</p>	<p>Common data and special categories of personal data (such as personal data contained in your resume, gender, country).</p>
<p>h. Your personal data may be processed to train and improve the functioning of the AI technology algorithm used to support us in the preliminary screening of candidates.</p> <p>In particular, in order to achieve this purpose, the algorithm will be trained to identify the relevance of a given</p>	<p>The legal basis for the processing is your consent (art. 6(1)(a) of the GDPR).</p>	<p>Your personal data contained in your application, and data related to your interaction with the event webpage.</p> <p>Unless the processing of special categories of personal data (namely: data related to your health, data revealing disabilities, data concerning sexual orientation, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership) is strictly necessary for assessing</p>



application to the Event by associating an input (i.e. your personal data) with a determined output (i.e. the positive/negative outcome of the human assessment performed by the event organizer).		specific job applications, we invite you not to share with us any such types of data.
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III. Data retention

For the purposes referred to in Sections 3.a), 3.b), 3.c) and 3.g), the data collected will be processed and retained for the time necessary to carry out the purposes mentioned above and, in any case, for up to 12 months.

For the purposes referred to in Section 3.d) and 3.e), we may retain your personal data for the period required by specific legal obligations or applicable legislation.

For the purpose referred to in Section 3.f), we may retain your personal data for up to 10 years or until you withdraw your consent to the processing.

For the purpose referred to in Section 3.h), the data collected will be processed and retained for the time necessary to carry out the purposes mentioned above and, in any case, for up to 12 months from your application.

IV. Your Choices

Your personal data is necessary for us to process your application. If you do not provide such data, we will not be able to evaluate your candidacy and we will have to exclude you from the application process. If your application or CV contains special categories of personal data (for example, data relating to your health, or revealing your ethnic origin, sexual orientation, religious belief, political affiliation or trade union membership), we will only process such data strictly for the purpose of enabling you to take part in the application process. With your prior consent, we may also process special categories of personal data when booking or organizing your transfer and accommodation.



VI. Recipients of Personal Data

Personal Data may be disclosed to the following categories of recipients:

- a) administrative personnel of the Company, control bodies, and authorized individuals, exclusively for the purposes mentioned above;
- b) public, judicial or police authorities, within the limits established by applicable laws and regulations;
- c) third parties carrying out activities that are related or instrumental to the Data Controller's activities, as data processors duly appointed in writing by the Company in accordance with Applicable Privacy Laws or acting as autonomous data controllers (such as, by way of example only, suppliers providing IT maintenance and development services, IT or filing services providers, hotels and travel management companies).

The complete and updated list of such entities is available for consultation, upon request, at the Company's headquarters or by sending an email to privacy@bendingspoons.com.

The Data Controller may display to the public, through any media and technologies known now or in the future (including, but not limited to, the Data Controller's websites and social media pages), your personal data as included in the Content for the purpose referred to in section II.e).

VII. Transfer of Personal Data outside EEA

The Company may also transfer Personal Data of the Data Subjects to countries located outside the European Economic Area (EEA). In such cases, the Company will make sure that such transfer is based on appropriate safeguards listed in the GDPR, including (a) the standard contractual clauses developed by the European Commission; (b) the decisions of adequacy of the European Commission concerning the States in which the recipients are based; (c) binding corporate rules adopted by the Company and approved by the competent authorities or that are parties of agreements with the Company in this regard. Copies of appropriate warranties are available on request at the Company's office or by sending an email to privacy@bendingspoons.com.

VIII. Rights of the Data Subjects

Data subjects, at any time and free of charge, can have or exercise the following rights, as specified in the GDPR:

- a) the right to be informed on the purposes and methods of the processing;
- b) the right of access;
- c) the right to ask for updating, rectification or integration of the data;
- d) the right to request the erasure of their data;
- e) the right to restrict the processing;
- f) when personal data is processed to pursue a legitimate interest of the Data Controller, the right to object to the processing, wholly or partly, on grounds related to their particular situation;



- g) the right to data portability (i.e., to receive a portable copy of their personal data), provided that personal data is processed by automated means and that the processing is based on data subjects' consent or on the basis of a contractual relationship with them;
- h) the right to withdraw the consent to the processing of the data freely and at any time (in such a case, the processing carried out before withdrawal of consent shall remain valid).

Data subjects also have the right to lodge a complaint before the competent national Data Protection Authority, in particular before the Data Protection Authority of the Member State of their habitual residence, place of work or place of the alleged infringement.

For the exercise of their rights, data subjects may contact the Data Controller by sending an email to privacy@bendingspoons.com. We may take reasonable steps to verify the identity of data subjects prior to responding to their requests.

IX. Automated decision-making

No entirely automated decision-making is carried out within the processing of the data subjects' personal data (including profiling under Article 22(1) and 22(4) of GDPR).

X. Changes and updates of this Privacy Policy

The Company may amend, modify, integrate and/or update, in whole or in part, this Privacy Policy. It is understood that any amendment, modification, integration or update will be communicated to the data subject in accordance with Applicable Privacy Laws.

Last amended: January 2nd, 2025