

General Information Notice for Candidates

This information notice is provided in order to clarify the scope of personal data processing within the context of your recruitment process with Multi-Color Corporation.

Data Controller and Data Protection Officer

The data controller for your personal data is Multi-Color Corporation (hereinafter referred to as "MCC," "Company," or "Controller"), located at 6111 N. River Rd., Floor 8 Rosemont, IL 60018, and can be reached at the email address legal@mcclabel.com.

The Controller has appointed a data protection officer (hereinafter referred to as "DPO"), who is available to you for any information regarding matters related to the processing of your personal data and the exercise of your rights as a data subject. The DPO can be contacted not only at the physical address of the Company's headquarters mentioned above but also at the email address: MCC_DPO@mcclabel.com

Categories of personal data processed and source of collection

The data processed by the Data Controller include:

- Common data, such as personal and identification information (name, surname, date of birth, image, etc.), contact information (landline and/or mobile phone number, email address, etc.), information related to your professional profile and work history, as well as any other relevant information provided in your curriculum vitae.
- Potentially, to the extent permitted by applicable regulations, data falling under the "special categories", specifically health-related data (including, in detail, any potential membership in so-called protected categories).

We inform you that if your curriculum vitae contains data falling under the special categories which the Data Controller is not required to process under the applicable regulations, or data that are not relevant to the purposes specified below, the Data Controller will refrain from processing such data. For this reason, unless strictly necessary, it is recommended that you do not provide excessive information. In any case, the Data Controller commits to not conduct any investigation, including via third parties, into the political, religious, or union-related opinions of the candidate, as well as any other matter not relevant to the assessment of the candidate's professional aptitude.

It is also possible that you may voluntarily provide the Data Controller with data concerning third parties within the scope of the aforementioned procedure. In this regard, you assume the role of an independent data controller with all legal obligations and responsibilities. In this sense, you indemnify the Data Controller from any dispute, claim, demand for compensation for damages arising from processing, etc., that may be received from third parties whose personal data has been processed through your spontaneous submission in violation of applicable data protection laws. In any case, if you provide or otherwise process personal data of third parties, you guarantee from now on, assuming all related responsibilities, that such specific processing scenario is based on an appropriate legal basis that legitimizes the processing of the information in question.

With specific reference to the source from which the aforementioned data originates, it should be noted that they are typically collected directly from you when you submit your application to the Company. In some cases, however, the Data Controller may collect your personal data from third parties, particularly from other companies within the MCC Group, as independent and distinct data controllers, from social networks exclusively and specifically relevant to the professional and work-related context (specifically, LinkedIn), or any relevant professional websites associated with you, as well as from employment agencies and other companies engaged in, for their own benefit or on behalf of third parties, intermediary, recruitment, and personnel relocation support activities.

Purposes, legal basis and nature of data collection for processing

Your personal data will be processed to evaluate the consistency of your profile with open job positions and, in general, for the management of personnel selection procedures, as well as to contact you in order to schedule necessary interviews ("**Purpose of managing your application**") for the execution of pre-contractual measures adopted at your request. The provision of your personal data for the above-mentioned purpose is optional, but failure to provide them could make it impossible for the Data Controller to evaluate your profile and/or schedule interviews.

Once provided or otherwise collected, your data may also be processed to fulfill obligations arising from the regulations applicable to the Data Controller ("**Compliance Purpose**") in the field of employment and social security and social protection law.

It should also be noted that, once provided or otherwise collected, your personal data may also be communicated to other companies within the MCC Group, which act as independent data controllers, to satisfy internal administrative, financial, and accounting needs ("**Purpose of intra-group circulation for administrative, financial, and accounting purposes**"); this processing is based on the legitimate interest of the Data Controller to satisfy internal administrative, financial, and accounting needs.

The Data Controller also reserves the right to process your personal data to fulfill any defensive purposes ("**Defensive Purpose**") based on the legitimate interest of the Data Controller, consisting in the need to exercise, defend, and assert rights in judicial proceedings as well as in out-of-court and pre-litigation phases.

Retention of personal data

Your personal data will be stored only for the time necessary for the purposes for which they are collected, in accordance with the principles of minimization and storage limitation, and in compliance with specific relevant company procedures.

Specifically, your curriculum vitae and other information related to your application will be retained as long as the position for which the curriculum vitae was submitted is available, and in the case of a spontaneous application, for a period of 3 years from their submission. At the end of this period, your data will be permanently deleted; however, the Data Controller reserves the right to contact you shortly before the indicated expiration to request an extension of this storage period if justified by recruitment procedure-related needs.

Furthermore, the Data Controller also reserves the right to retain your data for the entire duration necessary to fulfill the Compliance Purpose and the Defensive Purposes.

Recipients

In pursuit of the aforementioned processing purposes, your data may be shared with:

- personnel authorized for the processing of personal data;
- entities that, when processing personal data on behalf of the Data Controller, typically act as data processors;
- other companies within the MCC Group, acting as autonomous data controllers for the purpose of intra-group circulation for administrative, financial, and accounting purposes;
- entities, bodies, or authorities acting as autonomous data controllers, to whom the communication of your personal data is mandatory in compliance with legal provisions or orders from authorities.

The updated and comprehensive list of data processors is available at the Data Controller's premises and can also be requested from the Data Controller using the contact details provided above.

Data transfers

Some of your personal data may be shared with recipients located in a third country outside the applicable jurisdiction or with an international organization. The Data Controller assures that the processing of your personal data by these recipients complies with the applicable data protection law.

Further information is available from the Data Controller.

Your data subject rights

As a data subject, you have the right to exercise the following rights at any time:

- **Right of Access**: You have the right to obtain confirmation of whether or not your personal data is being processed, as well as the right to receive information regarding the details of the processing.
- **Right to Rectification**: You have the right to request the correction of inaccurate or incomplete personal data. Please note that, concerning personal data collected through audio and video recording systems, the right to rectification may not be feasible due to the intrinsic nature of the data, which pertains to objective and specific facts.
- **Right to Erasure**: Under certain circumstances, you have the right to request the deletion of your personal data from our records.
- **Right to Restriction of Processing**: In specific situations, you have the right to request the restriction of the processing of your personal data.
- **Right to Data Portability**: You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and you also have the right to request the transfer of your data to another data controller.
- **Right to Object**: You have the right to object to the processing of your personal data by providing reasons that justify your objection. The Controller will assess such requests, which may not be granted if there are compelling legitimate grounds for processing that outweigh your interests, rights, and freedoms.
- **Right to Lodge a Complaint with the Supervisory Authority**: If you believe that the processing of your personal data violates data protection regulations, you have the right to file a complaint with the supervisory authority of the member state in which you reside, work, or where the alleged violation occurred.

- Right to Judicial Remedies: You have the right to seek judicial remedies if you consider that your rights have been infringed.

To exercise those rights and obtain further information on the Processing of your personal data, you can contact the address listed at the beginning of this notice.

United States Privacy Rights

The Notice, either alone or in conjunction with other Company policies and procedures, satisfies Company's legal obligation to draft and/or provide notice with regard to how Company collects, uses, safeguards, disposes, or otherwise processes social security numbers or similar data afforded protection under U.S. state law, including the following: Conn. Gen. Stat. Ann. § 42-471; 201 Mass. Code Regs. §§ 17.01 – 17.04; Mich. CL § 445.84; New Mex. SA 1978, §§ 57-12b-1 – 57-12b-4; N.Y. Gen. Bus. Law § 399-ddd; and, Tex. Bus. & Com. Code Ann. § 501.052.

California

Data Privacy Rights. Pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"), California residents are entitled to certain data privacy rights:

- Right to Know (Specific Pieces of Personal Information). You have the right to know the specific pieces of your Personal Information that we have collected about you.
- Right to Know (Categories of Personal Information). You have the right to know (i) the categories of Personal Information we have collected from you; (ii) the categories of sources from which the Personal Information is collected; (iii) the categories of your Personal Information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your Personal Information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your Personal Information.
- Right to Delete. You have the right to request that we delete your Personal Information that we have collected and retain.
- Right to Correct. You have the right to request that we correct inaccurate Personal Information that we have collected and retain.
- Nondiscrimination. You have the right not to be subject to discrimination for asserting your rights under the CCPA.

Submit a Privacy Request. To submit a privacy request, you, or your authorized agent, may contact us at the information listed above.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your Personal Information, Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such Personal Information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of Personal Information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney pursuant to California Probate Code §§ 4121 to 4130. None of the CCPA's rights are absolute, and such rights are subject to legal and regulatory exceptions and exemptions. For more information about the CCPA, please see: <https://oag.ca.gov/privacy/ccpa>.

Opt-Out Rights / Do Not Sell My Personal Information. California residents have the right to opt out of the "sale" of their Personal Information. However, Company does not sell your Personal Information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of Personal Information (because we do not undertake such activities).

Opt-Out Rights / Do Not Share My Personal Information. California residents have the right to opt out of the "sharing" of their Personal Information. Except as otherwise provided on our publicly facing website, Company does not "share" Personal Information. Please see our website Privacy Policy for instructions on how to opt-out of the sharing of Personal Information.

Limit Use of Sensitive Personal Information. Company does not use or disclose sensitive Personal Information for reasons other than those set forth in the CCPA, and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive Personal Information.

Updates to this Notice

We reserve the right to update, modify, add or delete portions of this notice at any time. Each version of the notice takes effect from the time it is posted on the website. Significant changes to the processing of personal data will require your acknowledgment, in accordance with applicable legislation.

Last updated: 08 Aug 2024