JOB APPLICANT PRIVACY POLICY

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www.bbpmlife.com

Dear Job Applicant,

This Job Applicant Privacy Policy (hereinafter the "**Policy**" or the "**Notice**") is intended to explain how BBPM Life dac (hereinafter "BBPM Life", "**We**", the "**Company**" or the "**Data Controller**") processes any of your personal data as part of the job application process.

Your data will be processed in accordance with the applicable legal provisions and in compliance with the legal obligations regarding security and confidentiality.

1. Reference Legislation

Your personal data is processed according to Regulation (EU) 2016/679 (hereinafter the "**GDPR**") and by the Data Protection Act 2018, (hereinafter the "**Data Protection Act**").

2. Data Controller

The data controller of your personal data is BBPM Life, headquartered at Beaux Lane House, Mercer Street Lower, Dublin D02 DH60, Ireland; email: comunicazioni@bbpmlife.com.

The Company has appointed a data protection officer (hereinafter the "**DPO**"). The DPO is responsible for monitoring the application of and compliance with domestic and EU legal provisions on the protection of personal data and is available at: dpo@bbpmlife.com.

3. Personal data subject to processing

We may collect the following categories of information:

Categories of data	Data Type
Contact information	Name, address/eircode, date of birth, contact details
Proof of identity	Visa information (for non-EEA nationals requiring permission to work in Ireland)
Employment and education details	Employment history, education, qualification and training details, membership status of any relevant bodies, any information required for compliance with the Minimum Competency Code and/or Fitness and Probity Standards, any other details provided in your CV, during an interview or otherwise.
Other data	The Company may require background checks and collect further details in accordance with local laws and requirements.

4. Sources of personal data

We collect information from you when you apply for a position with the Company. We may obtain your personal data:

1. **Verbally:** As part of telephone/ face to face interviews
2. **CV/Tests:** CV, forms & tests where you submitted your application
3. **References***:* Referees you provided us with
4. **Social Media Channels***:* Social Media searches online (LinkedIn*)*

5. The purpose and legal basis

We collect your personal information that are necessary for the following purposes and legal basis:

Purpose	Legal Basis
To enter the interview process. Including: Screening, Telephone Interview, Face to Face Interview, and Reference checks	This is for the performance of a contract or in order to take steps at the request of the data subject prior entering into a contract.
To assess your skills, qualifications and aptitude against vacancies in BBPM Life which may be suitable for you	This is for the performance of a contract or in order to take steps at the request of the data subject prior entering into a contract.
To offer you a job after the interview stage	This is for the performance of a contract or in order to take steps at the request of the data subject prior entering into a contract.
To contact you about future vacancies/roles with BBPM Life which we think you may be interested in	This is for our legitimate interest of employing suitable candidates
To assess further personal qualities for certain positions (e.g. PCF functions)	Only if this is required for the compliance with a legal obligation, in particular employment law (such as the Reputation & Character/ Minimum Competency Code, Fitness and Probity).

You may refuse to provide any personal data requested from you. However, if you decide not to provide information requested, it may affect our ability to consider your application for the position in question.

6. Sharing of your data

We might share your data with our data processors such as storage service providers (e.g. Microsoft Azure, Bamboo) and backup providers. These subjects are in charge of the processing of personal data and operate in accordance with instructions received.

As part of the recruitment process, your personal data may be shared with other entities within the Group if required by the Company's policies. Such sharing will be carried out solely for purposes related to the recruitment process.

We may also communicate your information to any party you have given us permission to speak to (such as referee, recruitment agency or lawyer) and other people or companies associated with you.

If necessary, your data may be disclosed to competent authorities (*e.g.* Italian or Irish security agencies, official regulators, etc.).

7. Retention of personal data

The personal data processed are kept for a period strictly necessary to carry out the above activities/purposes. This means that the period of time for which we store your personal data may depend on the type of data we hold.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For further information, please do not hesitate to contact the Company at the addresses indicated in Section 2 of this Policy. This is without prejudice in any case to the possibility that the Company may retain your personal data for the period of time provided for and allowed by Irish law for protection of rights.

Data subject	Length of time
Successful applicants	The personal data generated by us and provided by you over the course of the job application/recruitment process will be retained by us for the purpose of your contract of employment. Some records may be deleted once the relevant information in them has been verified and you start working
Unsuccessful applicants	Data will be deleted once you have been advised that you have been unsuccessful in your application. Based on legitimate business purposes, BBPM Life may store data up to 18 months to exercise or defend against potential, threatened or actual complain and/or litigation.
Spontaneous applications	Your records may be retained up to 12 months to contact you about future vacancies/roles with BBPM Life which we think you may be interested in.

8. Security of the data

The Company will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Policy. We will use all reasonable efforts to put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, other recipients and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

9. Your rights and how to exercise them

The rights listed below may be exercised at any time by submitting a request in writing to the attention of the data protection officer at the contact details listed in Section 2 of this Policy.

The Company reserves the right to verify your identity by requesting the sending of an identity document or other forms suitable for the purpose (*e.g.* confirmation by personnel of the data controller).

The Company is obliged to respond to requests within one month from the date of receipt [1].

The Company also reserves the right to ask for clarification of requests received, in order to ensure rapid and targeted assistance.

9.1 Right of access

You have the right to obtain from us information on the personal data we hold on you including the following:

- Purposes of the processing
- Type of personal data held
- Categories of recipients of the personal data
- Information on how long the data will be stored
- If automated individual decision making, including profiling, takes place, as well as information on the logic involved and consequences of this
- If data is not collected directly from you, information on the source of the data
- The existence of the right to request from us rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing
- The right to lodge a complaint with the supervisory authorities.

[1] This time frame can be extended by up to two further months, considering the complexity of the request. The Company will let the applicant know before the expiry of the deadline, that an extension of time is required to deal with the request.

If you wish, you may also ask the Company for a copy of the personal data we have processed.

There is usually no charge applied to access your personal data (or to exercise any of the other rights).

However, if your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee. Alternatively, we may refuse to comply with your request in these circumstances.

9.2 Right to rectification

You have the right to ask the Company to correct any inaccurate personal data it has collected about you. You also have the right to ask the Company to complete any incomplete personal data it collected; you may provide the Company with additional information to do this.

9.3 Right to erasure

In certain instances, you have the right to ask the Company to erase the personal data it has collected about you. This right will not apply where we are required to process personal data in order to comply with a legal obligation or where the processing of this information is carried out for reasons of public interest in the area of public health. You have the right to have your data erased where one of the following applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- The data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing
- The data subject objects to the processing and there are no overriding legitimate grounds for the processing
- The personal data have been unlawfully processed
- The personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

9.4 Right to object

BBPM Life does not use your data for direct marketing purposes.

If you have reasons related to your particular situation, you have the right to oppose the processing of data processed by the Company in pursuit of its legitimate interest. You have the right to object to the processing of your personal data at any time:

- Where we process your personal data for the purposes of legitimate interests pursued by us, except where we can demonstrate compelling legitimate grounds for this processing which would override your interests, rights and freedoms or in connection with the enforcement or defense of a legal claim.

Should this occur, we will no longer process your personal data for these purposes unless doing so is justified by a compelling legitimate ground as described above.

9.5 Right to restrict processing

You have the right to ask the Company to restrict the processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data (we will restrict the processing of the personal data until we verify the accuracy of the personal data)
- The processing is unlawful, and you oppose the erasure of your personal data
- The Company no longer requires the personal data for the purposes of the processing, but the data is required by you for the establishment, exercise or defense of legal claims
- You object to the processing of the personal data as outlined in Section 9.4 above (we will restrict the processing of the personal data while we verify our legitimate grounds for the processing which may override your interests, rights and freedoms).

Where you have restricted the processing of your personal data, we will continue to store your personal data but will only process it with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of other people or for reasons of important public interest or other non-restricted purposes.

9.6 Right to data portability

You have the right to receive personal data concerning you which you have provided to us in a structured, commonly used and machine-readable format. You also have the right to provide this data to another controller or have the Company transmit this data to another controller on your behalf, where technically feasible. This applies to automated data only to the extent provided by you to us. This right to portability is limited to the following situations:

- Where the processing is based on the legal basis of consent or of entering into or performance of a contract and
- The processing is carried out by automated means.

9.7 Right to withdraw consent

No personal data should be processed on the legal bases of consent.

However, it might happen that we ask for your consent in particular circumstances.

If we are processing your personal data on the legal basis of consent, you are always entitled to withdraw your consent at any time. This does not affect the legality of the processing which took place when we had your consent.

10. Right to Complain

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR. You also have the right to an effective judicial remedy if you consider that your rights under this Regulation have been infringed as a result of processing by the Company.

Irish supervisory authority here below for your reference:

The Data Protection Commission, https://www.dataprotection.ie/en

11. Application of this Notice

This Policy applies from the time your personal data is provided to BBPM Life by you or a recruiter on your behalf for employment consideration purposes up to the point at which retention is no longer relevant as outlined in section 7 of this Notice or the point at which you commence employment with us.

Once you commence employment with BBPM Life, the way we process your personal data will no longer be dealt with under this Policy but will instead be governed by our Employee Data Protection Notice (which will be made available to you when you commence your employment with BBPM Life).

12. Changes

The Data Controller reserves the right to update the contents of this Policy on their own initiative or in the event of changes in the applicable legislation. This Policy was last updated 19 November 2026.