Santander

Associata ASSOFIN ABI

"INTRODUCE YOURSELF" PRIVACY POLICY

art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council

The Santander Group is a multinational group operating in several countries: using the "INTRODUCE YOURSELF" function included in the website *https://santander.wd3.myworkdayjobs.com/es/SantanderCareers*, Santander Consumer Bank S.p.A. (**SCB** or the **Controller**) makes available to those who wish to do so (the **Users**), the possibility to express their interest in Santander as a place to work, generally and spontaneously, by communicating his name and surname and sending his curriculum vitae, to be taken into account in the different job opportunities and talent attraction processes offered by SCB. Therefore, the functionality will allow the HR Team of the different SCB companies to access the User's personal information and, if their profile is of interest or appropriate to SCB, contact him/her so that, when interested, he/she will be considered for a specific vacancy or offer.

This Privacy Policy (hereinafter, the **Policy**) describes the purposes and methods by which SCB collects and processes your personal data, the entities to whom such data may be disclosed, as well as your rights under the European Regulation on the Protection of Personal Data n.679/2016 (hereinafter, the **Regulation**). SCB is committed to ensuring the proper processing of your personal data in accordance with this Policy, the provisions of the Regulations, Italian Legislative Decree no. 196/2003 (the **Italian Privacy Code**), the provisions of the Italian Data Protection Authority (*Autorità Garante per la protezione dei dati personali*), as well as the additional legislation in force regarding the protection of personal data.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller of your personal data is Santander Consumer Bank S.p.A., with registered office in Corso Massimo D'Azeglio, 33/E – 10126, Turin (Italy).
The Data Protection Officer (DPO) can be contacted at SCB's head office using the following address: dpo@santanderconsumer.it.

PERSONAL DATA PROCESSED

SCB collects and processes various categories of personal data, strictly to the extent necessary for the purpose of evaluating and processing your application.
By personal data (henceforth, the **Data**) we mean in particular:
- identifying data (e.g., first and last name, gender, place and date of birth, nationality, ID card number, passport number, driver's license number, signature);
- contact data (e.g., mailing address, e-mail address, telephone number):
- academic and professional data: e.g., training qualifications, professional experience, etc.
- employment data: e.g. profession, occupations, non-financial salary information, etc.

Data source: the Data in SCB's possession were provided directly by you, in a free and informed manner, through your completion of the contact form found at *https://santander.wd3.myworkdayjobs.com/es/SantanderCareers/introduceYourself*.

DATA PROCESSING PURPOSE AND LEGAL BASIS

The Data are processed by SCB for the purpose of evaluating the User within the talent selection framework and for existing job opportunities in SCB so that, if it may be appropriate for any of the existing vacancies, the Owner may contact him/her, as well as to obtain statistical information.

Legal basis for processing: management of your application, as well as comply with legal obligations and provisions issued by the competent Authorities, i.e. Supervisory and Control Authorities, to which SCB is subject. The Data provision is necessary and any refusal to provide them will make it impossible to carry out the activities necessary for the management of your application.

DATA PROCESSING METHODS

Your Data are processed with electronic processing, consultation, and any other appropriate operation only for pursuing the purposes for which it was collected and, in any case, in such a way as to guarantee their security and confidentiality. We also inform you that the Data it will not be the subject of automated decisions. In carrying out the processing activities, SCB undertakes to:

a) ensure the accuracy and updating of the Data processed, and promptly receive any corrections and/or additions requested by the Data subject;
b) notify the Data subject, within the timeframe and in the cases provided by the mandatory regulations, of any personal data violations;
c) ensure compliance of processing operations with applicable legal provisions.

SCB, moreover, processes personal Data acquired in full compliance with the principle of fairness, lawfulness, and transparency. In compliance with the Regulation, SCB configures or, in any case, undertakes to minimize the use of personal Data, to exclude their processing if the purposes pursued can be achieved by means of, respectively, anonymous Data or appropriate modalities that allow identifying the Data subject only in case of necessity.

DATA TRANSFER

The Data may be processed by specifically appointed and instructed parties, including employees and other collaborators empowered to do so, for processing strictly functional to the assessment activities mentioned in the paragraph *Purposes and legal basis of processing*. Such Data may also be communicated to third parties who provide certain services to SCB or who require such communication due to a legal or regulatory obligation, such as third-party service providers necessary to ensure the operation of its website (by way of example: company in charge of hosting services) all in compliance with applicable data security regulations. These entities may be based inside or outside the territory of the European Union (to countries that offer similar or equivalent protection to the one guaranteed by the EU Regulation, recognized by an adequacy decision of the competent authority, or by adopting appropriate safeguards such as standard contractual clauses or binding corporate rules) and operate, as the case may be, as Data Processors, or independently as separate Data Controllers. Data Controllers include Workday Inc. based in the United States, which is not part of the European Economic Area. The Controller, through its subsidiary Santander Global Technologies S.L., has signed standard contractual clauses with Workday Inc. The updated list of Data Processors is available by sending a written request to: dpo@santanderconsumer.it.

DATA STORAGE

In compliance with the principles of proportionality and necessity, the Data will not be kept for longer periods than those needed to fulfill the purposes indicated above and, therefore, to the diligent performance of the services solicited by the user. Personal Data related to the pursuit of contact purposes shall be processed for the time strictly necessary for such purposes and may be kept for a maximum period of 24 (twenty-four) months from the contact. This is always without prejudice, in any case and depending on the specific purpose of processing and type of data processed, the possibility of their further storage in fulfillment of any legal obligations or for the protection of hypothetical rights in court and for the management of any out-of-court litigation. SCB has adopted specific security measures to ensure the security and confidentiality of data and to prevent their loss, illicit or incorrect use and unauthorized access, in compliance with the Regulations.

YOUR RIGHTS

Pursuant to the Regulations and legislation on the protection of personal data, you have the right to:
(a) request access to your Data, in order to request a copy and verify that it is processed in accordance with the law;
(b) request rectification of Your Data, in order to request the correction of any incomplete or inaccurate information about You;
(c) request the deletion of Your Data, where there are no longer valid reasons for continuing to process it;
(d) object to the processing of your Data where the legal basis for the processing is the legitimate interest of SCB (or a third party) and there is a particular interest in objecting to such processing. You also have the right to object to processing carried out for marketing purposes;
(e) request the restriction of the processing of Data and obtain the suspension of the processing of your Data;
(f) request the transfer of the Data to another party.
These rights may be exercised by registered letter to be sent to Santander Consumer Bank S.p.A., Corso Massimo D'Azeglio, 33/E - 10126 Turin (Italy), to the attention of the Data Protection Officer, or by e-mail to dpo@santanderconsumer.it.
In the case of requests sent by e-mail, we invite you to check in advance that your domain is not on public blacklists by means of a consultation from the website *https://mxtoolbox.com/blacklists.aspx*, since messages from e-mail domains resulting in such lists are automatically blocked by company computer security tools.

Proposing a complaint to a Supervisory Authority: Without prejudice to any other administrative or judicial remedy, if you believe that the processing carried out by SCB is in violation of the law, it is also your right to propose a complaint to the Italian Data Protection Authority (*Autorità Garante per la protezione dei dati personali*).