Privacy Notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, so-called "GDPR")

"JOB APPLICANTS" SEAFARERS

Data Controller

The Data Controller is Phoenix Offshore S.r.l. – Vat Number 00558170643- with registered office in Naples (Na), Street Mario Morgantini, 3 – 80133- E-mail careers@phoenixoffshore.it

Purpose of Processing and Legal Basis

Your personal data is used for the following purposes:

a) for assessing the candidate's professional profile in relation to current and future open positions;
b) to present the individual's profile to potential employers and arrange interviews;

These purposes do not require consent since the processing involves data voluntarily provided by the individual for the purpose of a possible employment/collaboration relationship (the legal basis for processing is therefore carrying out the pre-contractual phase under Article 6, paragraph 1, letter b GDPR). The same applies to any special data provided in the same way by the individual, for which consent is excluded by Article 9, paragraph 2, letter b) GDPR.

c) to fulfil legal obligations or requests from the competent authorities. In this case, the legal basis for processing is the compliance with a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c) GDPR).
d) to protect the rights of the Data Controller in court or out of court (Article 6, paragraph 1, letter f) GDPR).

Categories of personal data being processed

For carrying out the aforementioned purposes, the following categories of personal data are processed: name, address, or other personal identification details; data regarding professional qualifications, work experience as can be seen from the maritime work certificate, and salary classification; social security data; and any other information included in the resume.

Data belonging to **special categories** may also be processed, such as data regarding membership in protected categories or, if the candidate makes them public in their resume or during the selection process, data capable of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership in parties, unions, associations, or organizations of a religious, philosophical, political, or trade union nature; as well as personal data capable of revealing health status detectable from a valid Medical Certificate that proves fitness to perform duties at sea, as well as ensuring that the person doesn't have medical issues that could be worsened by work at sea, make them unfit for the role, or put the health of others on board at risk. Providing this last information is optional and up to the candidate, with no prompting from the Employer. Finally, for certain positions, **Judicial Data** might be required, meaning information about criminal convictions or offenses and related security measures.

Methods of processing and data retention

For the purpose covered by this notice, the data will be processed in an automated and/or traditional manner and, in any case, in such a way as to guarantee the security and confidentiality of the data themselves. **Considering the special nature of maritime employment contracts, candidate profiles, in the interest of the candidates themselves, will be kept in a database for a period of 10 years, without prejudice to the possibility for the individuals concerned to request deletion at any time.**

To ensure the accuracy and updating of the data, the Data Controller undertakes to periodically request confirmation when new positions compatible with the profiles of the individuals concerned are available. The data may be used by personnel of the Data Controller who have been assigned a specific data protection role and have been given appropriate operational instructions, pursuant to Articles 29 of the GDPR and 2 quaterdecies of the Privacy Code, as well as by third-party companies carrying out supporting activities on behalf of the Controller within the scope of the purposes described above (e.g., provision of administrative and accounting services, provision of IT infrastructure, provision of consultancy in labour law, etc.); the latter act as data processors, under the direction and control of the Controller, based on data processing agreements (so-called Data Processing Agreements – DPA) signed pursuant to art. 28 GDPR.

In addition, data may be shared with public authorities to comply with legal obligations, to follow orders from public authorities, or to exercise a right in legal proceedings. The third-party entities indicated will act as independent data controllers. Personal data is not disclosed to unspecified recipients.

Further information on the names of individual companies or on the categories of recipients of the data can be obtained by writing to privacy@nextgeosolution.com

Scope of circulation linked to the ' NextGeo Group'

Personal data may be shared with other companies in the NextGeo Group that carry out service or instrumental activities on behalf of the Data Controller Company. Depending on the service provided, these companies may act either as independent controllers or as processors under art.28 GDPR.

Exercise of rights

At any moment, in your capacity as data subject concerned by the processing, you may exercise the following rights:

- to obtain confirmation of whether or not such data exist and, if so, to know their content and origin,
- to verify their accuracy and/or request the rectification of inaccurate data, the completion of incomplete data or the update of outdated data,
- or to obtain the restriction of processing, where one of the conditions provided for by Article 18 of the GDPR applies;
- to request the erasure of data processed in violation of law, or in the presence of one of the other conditions provided for by Article 17, paragraph 1, letters a), b), c), e) and f) of the GDPR
- to object at all times, for legitimate reasons, to their processing, or to object to processing in the other cases provided for by Article 21, paragraphs 2 and 3 and Article 22 of the GDPR;

Requests relating to the exercise of the aforementioned rights should be addressed to the Company's Compliance Privacy Coordinator: e-mail, at this address: privacy@nextgeosolutions.com by sending registered letter with acknowledgement of receipt to the following address: Via S, Brigida,39 – 80133- Napoli (Na).

We also remind You that, should You consider that Your rights have not been respected or that You have not received a response in accordance with the law, you have the right to lodge a complaint with the Data Protection Authority for the protection of personal data pursuant to Article 77 of the GDPR, or to bring proceedings before the competent judicial authority pursuant to Article 79 of the GDPR.