

**PRIVACY POLICY - WORKERS**  
**On the processing of personal data**  
Articles 12 and following of Regulation (EU) 2016/679 (GDPR)

**INTRODUCTION**

In compliance with the provisions of the EU Regulation 2016/679 (hereinafter GDPR), we hereby provide you with information regarding the processing of personal data provided in relation to your interactions with our organization. This disclosure is made in accordance with Article 13 of the GDPR.

**1. IDENTITY AND CONTACT INFORMATION**

The Data Controller is Jobby Technologies LTD., with registered office in 22-24 Ely Place - London - EC1N 6TE, and the contact details are: email: hello@jobbyworks.co.uk

**2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)**

The Data Protection Officer is Dr. Mario Brocca, telephone: +390371/5943191, email: dpo@zucchetti.it; certified email (PEC): dpogruppozucchetti@gruppozucchetti.it.

**3. PURPOSE OF PROCESSING, LEGAL BASIS, AND DATA RETENTION PERIOD**

<i>Purposes</i>	<i>Types of Data Processed</i>	<i>Legal Basis</i>	<i>Data Retention Period *</i>
<p><b>a) Contractual</b></p> <p>I. Fulfill contractual obligations outlined in Jobby's "Terms and Conditions" for Registration</p> <p>II. Allow Registered Users to view Assignments and/or submit their Applications</p> <p>III. Connect Registered Users to facilitate the conclusion of an Employment Contract between the Offering Party and Worker</p> <p>IV. Build "worker" profiles to enhance service delivery</p> <p>V. Provide the requested instant messaging service to Registered Users</p> <p>VI. Manage the execution of the employment contract (e.g., activation of insurance)</p> <p>VII. Manage payments</p> <p>VIII. Fulfill fiscal and accounting obligations</p>	<p>Biographical and contact information</p> <p>Information necessary for the execution of the contractual relationship</p> <p>Invoicing information</p> <p>Digital signature</p> <p>Details regarding availability in terms of work</p> <p>Technical skills</p> <p>Any soft skills</p> <p>Preferences regarding the type of work one wishes to perform</p> <p>Possession of licenses</p> <p>Membership in protected categories</p>	<p>Execution of a contract of which you are a part or pre-contractual measures adopted at the request of the data subject;</p> <p>Compliance with legal obligations (Purpose "V.")</p> <p>(Article 6, paragraph 1, letters b) and c) of the General Data Protection Regulation (GDPR))</p>	<p>Regarding the personal data present on the platform for using the service: until the User-worker's profile is deleted. The deletion of the profile will mean that the worker can no longer enjoy the service offered by the Platform.</p> <p>Regarding the documentation related to contracts between the worker and various Providers: see letter "f)" of this information.</p> <p>Concerning accounting data and documents: as per the law (10 years from the resolution of the contract with Jobby).</p>
<p><b>b) Sharing data with third parties for additional services</b></p> <p>✓ Benefits/discounts</p>	<p>Anagrafic and contact information</p>	<p>Consent (required at the time of registration) (Optional and revocable at any time)</p> <p>Article 6, paragraph 1, letter a) GDPR</p>	<p>Until the revocation of consent</p>
<p><b>c) Sending alerts to already registered users.</b></p> <p>Communications, alerts, and notifications related to Services, Announcements, and Assignments upon the request of the interested party and/or relevant to the requested Services.</p>	<p>Anagrafic and contact information</p>	<p>Legitimate interest</p> <p>Art. 6 para. 1 letter f) GDPR.</p>	<p>Until opposition by the data subject.</p>
<p><b>d) Carrying out activities for accounting review.</b></p>		<p>Legitimate interest</p>	<p>....</p>

		Art. 6 para. 1 letter f) GDPR.	
e) If necessary, <b>to ascertain, exercise, or defend rights</b> in a judicial context.	Personal data and contact details, data related to the execution of the contract.	Legitimate interest (judicial protection) Art. 6 para. 1 lett. f) GDPR.	For the time necessary for the exercise of rights in judicial proceedings
f) To ensure completeness of the service and compliance with labor regulations.	Documentation related to contracts concluded between the worker and the company (stored in pseudonymized mode).	Legitimate interest (judicial protection) Art. 6 para. 1 lett. f) GDPR.	Even following the deletion of data by the worker, documents are retained for 24 months from the deletion of the profile by the user or completion of the work.
g) Purpose of assistance for purchased products and services to resolve anomalies and malfunctions.	Personal data, contact information, and personal data related to the contracted product/service.	Execution of a contract to which you are a party. Legitimate interest (for analyses aimed at improving the service).	Five years from the last interaction.

\*Upon deletion, data may be retained for an additional period, up to a maximum of 30 days, in accordance with the backup retention policies of AWS information systems.

#### 4. OBLIGATION TO PROVIDE DATA

The data subject must provide the Companies with the necessary data for the execution of the contractual relationship, as well as the data required to fulfill obligations prescribed by laws, regulations, community regulations, or by provisions of Authorities legitimized by law and by supervisory and control bodies.

The processing of data for purposes not essential to the execution of the contractual relationship is classified as supplementary, and the provision of such data by the data subject, if required, is optional and subject to consent. The consent given may be revoked by the data subject at any time by writing an email to support@jobbyworks.co.uk, as well as opposition to the processing of personal data based on legitimate interest. Such revocation and opposition will not in any way affect the lawfulness of the processing carried out before the revocation and/or opposition occurred.

#### 5. PROCESSING METHODS

Personal data will be recorded, processed, and stored by the Company in both paper and electronic form, in compliance with the appropriate technical and organizational measures as per Article 32 of the GDPR. The processing of personal data of the data subject may consist of any operation or set of operations among those listed in Article 4, paragraph 1, point 2 of the GDPR.

The processing of personal data will take place using tools and procedures suitable to ensure their security and confidentiality and may be carried out, directly and/or through delegated third parties, either manually using paper media or by using computerized or electronic means. The data, for the purpose of properly managing the relationship and fulfilling legal obligations, may be included in the internal documentation of the Companies and, if necessary, also in the writings and registers required by law.

The personal data of the data subject may be processed by the employees of the company's business functions entrusted with the pursuit of the aforementioned purposes. These employees have been expressly authorized for processing and have received adequate operational instructions in accordance with Article 29 of the GDPR.

#### 6. ATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data of the data subject may be communicated and processed by external parties, if necessary and functional to the conduct of the activity, which operate both as autonomous data controllers pursuant to Articles 4 and 24 of the GDPR, whether public or private, authorized to request the data and/or as entities acting as Data Processors under Article 28 of the GDPR), such as, for example: companies supporting Jobby S.r.l. in the provision of the service (e.g., for the instant messaging service available on the App that can be activated upon request of the Registered User); consulting companies and/or professional studies and/or professionals, such as legal, tax, management, and personnel training, audit and certification, leasing, editorial; digital payment service providers and insurance companies.

Furthermore, data may be disclosed to other companies only following the provided consent.

#### 7. TRANSFER OF DATA TO NON-EU COUNTRIES

The data provided by the data subject will be primarily processed in countries within the European Union, with the exception of the UK, in which case the rights granted to the data subject by the EU regulations will still be guaranteed due to the adequacy decision issued by the European Commission.

#### **8. RIGHTS OF THE DATA SUBJECT:**

According to Articles 15 and subsequent articles of the GDPR, the data subject may exercise the following rights:

- a. Access: Confirm whether there is processing of the data subject's personal data and the right to access such data. It's not possible to respond to manifestly unfounded, excessive, or repetitive requests.
- b. Rectification: Correct or obtain the correction of personal data if inaccurate or incomplete and complete them if incomplete.
- c. Erasure/Right to be Forgotten: Obtain, in some cases, the deletion of the provided personal data. However, this is not an absolute right, as companies may have legitimate or legal reasons to retain them.
- d. Limitation: Data will be archived but cannot be processed or further processed in cases specified by the regulations.
- e. Portability: Move, copy, or transfer data from the companies' databases to third parties. This applies only to data provided by the data subject for the execution of a contract or for which consent has been given, and the processing is done by automated means.
- f. Objection to Processing Based on Legitimate Interest: Object to the processing of data based on legitimate interest.
- g. Revocation of Consent: Revoke consent at any time, if the processing is based on consent.

In accordance with Article 2-undecies of Legislative Decree 196/2003, the exercise of the data subject's rights may be delayed, limited, or excluded, with motivated communication made without delay, unless the communication may compromise the purpose of the limitation, for the time and within the limits where this constitutes a necessary and proportionate measure, taking into account the fundamental rights and legitimate interests of the data subject, in order to safeguard the interests specified in paragraph 1, letters a) (interests protected in the field of money laundering), e) (carrying out defensive investigations or exercising a right in court), and f) (confidentiality of the identity of the employee reporting offenses he became aware of in the course of his duties). In such cases, the data subject's rights can also be exercised through the Guarantor, in accordance with the methods specified in Article 160 of the same Decree. In this case, the Guarantor will inform the data subject that all necessary checks have been carried out or a review has been carried out, as well as the data subject's right to bring legal action.

It is also specified that - before processing requests - the company may verify the identity of the data subject to assess the legitimacy of the received request.

To exercise these rights, the data subject can contact the address [support@jobbyworks.co.uk](mailto:support@jobbyworks.co.uk). The company will respond within 30 days of receiving the formal request from the data subject. Please note that in the event of a breach of the data subject's personal data, the data subject may file a complaint with the competent authority: "Data Protection Authority."

**JOBBY TECHNOLOGIES LTD.**