

## Schedule 4

### Essence of the Joint Controllership Agreement

#### 1. Background

- A. **E-work S.p.A.** with registered office at Via Teocrito 47, 20128, Milano (MI), Tax Code and VAT number 13063380151 and **E-work HR Company Poland Sp. z o.o.** with registered office at ul. Narutowicza 7/9, 90-117 Łódź, Tax Code and VAT number 7262395049, (each a “**Party**” and together the “**Parties**”) are employment agencies belonging to e-work group.
- B. Within the scope of specific recruiting projects, Parties have agreed to share each other curricula and other personal data of their candidates, through the implementation of a common database (“**Database**”), in order to propose job offers aimed at establishing an employment relationship with Parties’ clients (the “**Project**”).
- C. In compliance with art. 26 of General Data Protection Regulation (GDPR), Parties have agreed to enter in a joint controllership agreement to regulate the processing carried out as joint controllers (“**Joint Controllers**”) and provide to data subjects the essence of the Agreement, as described below.

#### 2. Why Parties are Joint Controllers?

- 2.1. Parties consider themselves Joint Controllers because within the scope of specific recruiting projects:
  - **they jointly determine means of the processing of candidates’ personal data:** in particular, they have implemented a common Database and they apply, through the same provider, common security measures to such Database;
  - **they jointly determine purposes of the processing of candidates’ personal data,** as described in par. 3.

#### 3. What are the jointly purposes pursued by Parties as Joint Controllers?

- 3.1. Parties jointly pursue the following purposes:
  - a. **research and selection**, within the scope of specific recruiting projects previously agreed and shared by Joint Controllers, of candidates to be placed with Parties’ clients in order to establish a work or collaboration relationship with them;
  - b. **sending communications** via e-mail to the candidates relating to job offers available for job positions open at Parties’ clients, within the scope of specific recruiting projects previously agreed and shared by Joint Controllers.

With regard to processing of personal data carried out for purposes other than those described above, each Party remains the sole Controller of the processing and provides its own privacy notice.

#### 4. What is the joint controller agreement and what does it provide for?

- 4.1. The joint controller agreement is a mandatory document required by article 26 GDPR, to be drafted when two or more controllers jointly determine the purposes and means of processing. Such agreement regulates in a transparent manner responsibilities of Joint Controllers for compliance with the obligations under the GDPR and applicable privacy laws, in particular with regard to transparency obligations and the exercising of the rights of the data subjects.

- 4.2. In brief, the joint controller agreement between Joint Controllers regulates their obligations and responsibilities with regard to the processing of candidates' personal data included in the common Database implemented by the same. This processing is aimed at allowing Parties to select and research candidates, within the scope of specific recruiting projects, proposing them job offers in line with the specific job positions.
- 4.3. Joint Controllers with reference to transparency obligations and the exercising of the rights of the data subjects have agreed that:
- they shall publish the privacy notice in their respective websites and, in any case, that they shall provide the privacy notice to the data subjects, where personal data have not been collected through their respective websites, making sure that the privacy notice addressed to candidates is updated in due time and consistently with the GDPR;
  - in case data subjects exercise their privacy rights, the Party which has collected personal data, either online (e.g. website) or offline, will be responsible for (i) managing the requests and (ii) replying to data subjects;
  - given that data subjects may exercise their privacy rights in respect of and against each of the Parties, the same will always cooperate to the best of their efforts to satisfy data subjects' requests in the context of the Project and support their management and resolution in the quickest and most effective way.

## 5. How can data subjects exercise their privacy rights?

5.1. Data subjects can exercise their privacy rights forwarding their request to:

- **E-work S.p.A.** with registered office at Via Teocrito 47, 20128, Milano (MI), Tax Code and VAT number 13063380151, at the following e-mail address: [privacy@e-workspa.it](mailto:privacy@e-workspa.it).  
E-work S.p.A. has appointed a data protection officer (DPO) that can be contacted at the following e-mail address: [rpd@e-workspa.it](mailto:rpd@e-workspa.it).
- **E-work HR Company Poland Sp. z o.o.** with registered office at ul. Narutowicza 7/9, 90-117 Łódź, Tax Code and VAT number 7262395049, at the following e-mail address: [iod@e-workspa.pl](mailto:iod@e-workspa.pl).