

## Job Applicants Data Privacy Notice

### 1. Identification and contact details of the Data Controller

Generali Seguros y Reaseguros, S.A.U., trading in the United Kingdom through its UK branch, with registered office at Paseo de las Doce Estrellas, 4, C.P. 28042 Madrid, Spain, with VAT number A-48037642 (hereinafter "Generali" or the "Insurer") is the data controller for the personal data that is processed in order to manage your candidacy for the vacancy as a job applicant. This clause provides information on how the Insurer will use your personal data.

The purpose of this Data Privacy Notice is to provide information on the processing of personal data and the rights under the UK General Data Protection Regulation ("GDPR") to those who apply for a job to those who are recommended for a vacancy, or to those who file a complaint or exercise a right within the recruitment framework.

Generali has a Data Protection Officer appointed before the Information Commissioners Office, who can be contacted at the following address [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie). If you have any questions regarding the processing of your personal data, please contact the Data Protection Officer at the aforementioned email address or by post to: 5 Town Hall Place, Farnham Street, Cavan, Co. Cavan, Ireland, H12 V9F5.

### 2. General information: description of the information contained in the Data Privacy Notice

In this Data Privacy Notice you will find tables identifying each of the different activities performed by Generali. These informative tables will detail:

- The purposes of the processing of your personal data, i.e., the reason why Generali processes your personal data.
- The legal basis that allows the processing of data by the Insurer for each of the purposes indicated.

- The possible communication of your data to third parties, as well as the reason for such communication. To this end, we inform you that we do not transfer your personal data to third parties except where there is a legal obligation (Tax Authorities, Judges and Courts, Security Forces, etc.), in case of communicating them to other Generali Group companies within the framework of the management of internal promotion processes, never for commercial purposes, or when expressly indicated in the table below. On the other hand, Generali data processors may have access to your personal data, i.e. service providers that have access to your personal data in order to carry out their duties, and that are generally providing services relating to information systems, technology, telecommunications, cloud computing and network security, human resources management services, fraud prevention and professional networks. The table below will indicate those other areas where Generali service providers may have access to your data from time to time. You can request more detailed information about the recipients of your data by sending an e-mail to the address [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie), indicating the specific processing activity about whose recipients you would like information.
- The existence of potential international data transfers.  
For these purposes, much of our processing activities require the transfer of data internationally to technological service providers or entities of the group to which Generali belongs, located in the United States and India, for which the pertinent Standard Contractual Clauses apply, or the State is recognised as a state providing adequate safeguards.

We may transfer your personal data to our affiliates, service providers, and partners located within the European Economic Area (EEA) to carry out the purposes described in this notice.

Under the UK General Data Protection Regulation (GDPR), the UK government has made adequacy regulations determining that EEA countries have a sufficiently high level of data protection. This means we can transfer your personal data to these countries without needing additional safeguards.

We will always ensure that any such transfers are conducted securely and in accordance with our data protection obligations.

You can request more detailed information regarding the international transfers of your data, or the guarantees applied by sending an e-mail to [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie), indicating the specific processing activity about which you would like to receive information regarding the guarantees applying

- The retention period of the data you provide us with.  
For this purpose, we keep your personal data for the time necessary for the purposes for which they were collected.. You can request more detailed information regarding our data retention notice by sending an e-mail to [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie), indicating the specific processing activity about which you would like to receive information on its retention.

### **3. Necessary, up-to-date and accurate information**

Generali will process personal data, in those cases provided by law, provided directly by the interested party or obtained by other lawful means. Data may be received from third parties, such as recruitment companies, and people or providers recommending the candidate.

The personal data processed can be found among the non-exhaustive list of the following categories: identification data, location data, professional background data, educational data and equivalent (i.e., C.V., references, etc.) in case the vacancy requires it.

You are required to provide us with the data we request through various means of collection, including the digital portals of Generali, professional networks such as LinkedIn, email, telephone or paper. If you do not provide us with all information requested, we may not be able to send you communications. Likewise, by fulfilling and sending the required information, you declare that the information and data you have provided is accurate and true.

#### 4. Rights exercise.

You can exercise the following rights:

1. right of **access** to your personal data to find out if it is being processed, and if so, what exactly is being processed and the specific processing activity that is being carried out, including the purposes, categories of data processed and recipients, among other information;
2. right to **rectification** of any inaccurate personal data;
3. right of **erasure** of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected, and provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in section 5, is not a legal obligation;
4. right to **object** to the processing of your personal data, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table included in section 5, is the legitimate interest of Generali or a third party. Generali will stop processing your data unless a compelling or higher legitimate interest for the processing is proven, or in case they are simply kept blocked for the formulation, exercise or defence of claims;
5. the right to request the **restriction** of the processing of your personal data where the accuracy, lawfulness or necessity of the data processing is in question, in which case we may retain the blocked data for the exercise or defense of claims;
6. the right to **portability** of your data, i.e. to receive your personal data in a structured, commonly used and machine-readable format, in order to transmit them to you or to another data controller, provided that the legitimate basis that enables us to process it, from among those indicated in the second column of the table in section 5, is the existence of a contractual relationship or your consent;
7. the right not to be subject to **automated** decisions that may affect on your legal rights, or that significantly affect you and when such decisions are being made;



You can exercise your rights at any time and free of charge by sending an e-mail to [DataProtectionOfficer@redclick.ie](mailto:DataProtectionOfficer@redclick.ie)

In addition, you have the right to lodge a complaint with Generali or the Data Protection Commission, if you believe that there has been a breach of data protection legislation in relation to the processing of your personal data.

## 5. Detailed information on the processing carried out

5.1 If you have applied for a job or have been recommended for a vacancy by a colleague:		
Purpose of the processing	Legitimate basis	Recipients
Manage the pre-selection and recruitment process, which includes: review and drafting of offer letters and/or contracts, collection of documentation, such as C.V. and work permits, check references from previous jobs, take internal notes, take admission tests and interviews.	Depending on the specific case: (i) Compliance with precontractual procedures, for the collection of the information necessary to establish a contractual relationship; (ii) Compliance with legal obligations in labour matters.	<p>Your data may be communicated within the framework of this processing to recruitment agencies, universities, or to job placement websites.</p> <p>The categories of service providers that may have access to your data, in addition to those listed in section 2, would be recruitment service providers.</p>
Manage the requests from official bodies, coordinate legal actions, trial and pre-trial procedures initiated by (or against) Generali.	Compliance with legal obligations in labour matters.	Your personal data may be communicated within the framework of this processing to official bodies, auditors, lawyers and to the parent company to which Generali belongs.

<p>To make back-up copies of systems, maintain the business continuity plan, the security breach management policy, the information access control policy, as well as to control the traffic of information entering/leaving the Insurer's systems. Applications and projects will also be developed, helping to detect possible failures in the systems and solving them. Use analytical tools for security diagnostics and development of infrastructures and applications, including monitoring and alerts on the use of digital channels, as well as their communication to network and information security service providers. Likewise, part of this purpose is to host the data and documentation in the cloud, manage the transfer of information through the technological framework of Generali, as well as control the information traffic that enters/exits the Insurer's systems, including the classification, digitization and custody of the company's physical documentation.</p>	<p>Depending on the specific case: (i) Generali's legitimate interest in guaranteeing cybersecurity, information security, the performance of applications and the improvement of the services provided, including the fight against fraud; (ii) Fulfilment of a legal obligation.</p>	<p>Your personal data may be communicated within the framework of this processing to entities of the group to which Generali belongs.</p> <p>The categories of service providers that may have access to your data in addition to those indicated in section 2, would be communication service providers, courier service providers and information storage service providers.</p>
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Video surveillance and access control at the various Generali headquarters to ensure the safety of people and property and the Insurer's premises, as well as for the prosecution of crimes, where appropriate.	Legitimate interest of Generali in ensuring the security of its facilities.	The categories of service providers that may have access to your data in addition to those indicated in section 2, would be access control, security and video surveillance service providers.
To carry out relevant actions and investigations to prevent money laundering, the financing of terrorism, conflicts of interest and assess the adequacy of a person with a view to hiring. It includes the prevention of transactions with internationally sanctioned parties. Complaints made through the Insurer's ethics line are taken into consideration.	Depending on the specific case: (i) compliance with a legal obligation; (ii) Legitimate interest of Generali in preventing money laundering and the financing of terrorism.	Your personal data may be communicated within the framework of this processing to the parent company of the group to which Generali belongs, as well as to external auditors or public authorities.
To carry out internal and/or external audit processes and ensure the company's regulatory compliance	Legitimate interest of Generali on the basis of a legal authorisation and to ensure compliance with internal procedures.	<p>Your data may be communicated within the framework of this processing to any official body or public authority, external auditors, lawyers and to the parent company of the group to which Generali belongs.</p> <p>The categories of service providers that may have access to your data in addition to those indicated in section 2, would be consultancy and legal service providers.</p>



## 5.2 If you have filed a complaint or exercised a right within the recruitment framework

Purpose of the processing	Legitimate basis	Recipients
Complaints and queries about the recruitment process: handle, investigate and solve complaints through the platform, telephone or email.	Generali legitimate interest in attending to complaints and queries.	Your data may be communicated within the framework of this processing to official bodies, ombudsman or public authorities involved in the complaint submitted.
Complaints and queries about the recruitment process: to respond to complaints regarding privacy and exercise of rights of access, rectification, erasure, objection, restriction and portability by email or writing.	Legal obligation to deal with privacy complaints or exercise of rights of access, rectification, erasure, objection, restriction and portability rights raised by candidates of Generali.	Your data may be communicated within the framework of this processing to the Information Commissioners Office.

## 6. Confidentiality

The personal data that we may collect through our websites, portals, forms, contact mailboxes, as well as through the various electronic or telephone communications that we maintain with you will be processed confidentially by Generali, with Generali pledging to keep these secret in accordance with the provisions of applicable law.

## **7. Update of the Data Privacy Notice**

This Data Privacy Notice may need to be updated. It is therefore necessary that you review this notice periodically in order to be properly informed about the type of information collected and its processing. This Data Privacy Notice was updated in September 2025.