Prime
ENGINEERING

PRIVACY POLICY

Last updated on 11.2026

This **Privacy Policy** explains what we do with your personal data. It describes the way we gather, use and handle your personal data and, by doing so, how we comply with our legal obligations towards you. Your privacy is important to us, and we are focused on protecting and safeguarding your personal data.

Please take a few moments to get to know our privacy practices. If you have any questions, contact us through the email address **gdpr@primeengineering.it** or the postal address **Strada 6, Edificio A13, 20057 Assago, Milano**.

We try to keep this Privacy Policy as simple as possible, but in case you are not familiar with any of the terms used or if you have any questions, don't hesitate to contact Prime Engineering to know more.

Occasionally, we may alter this Privacy Policy. If you want to keep up to date, visit this page, as all alterations shall be published here.

A) WHO GATHERS YOUR PERSONAL DATA, AND WHO IS THE AUTHORITY RESPONSIBLE FOR ITS HANDLING?

The handling of any personal data gathered by Prime Engineering Italia, or provided to them, are responsibility of the company PrimeIT Italia S.R.L, a public limited company, legal person no. 13193170969, with registered office at Via Ceresio, no.7, 20154 Milan, which contact data may be found later on this Privacy Policy (hereinafter referred to as "Prime Engineering Italia" or "we").

B) HOW IS MY PERSONAL DATA GATHERED, AND WHAT TYPE OF DATA IS GATHERED?

Please be aware that you are not forced to provide Prime Engineering Italia any personal data that the company might request (you can exercise your Right of Opposition at any time), but if you choose not to do so, we might not be able to provide you our services, manage your application or answer to any question you might have.

Prime Engineering Italia may gather your personal data in many ways, namely when you subscribe to our newsletter, send us spontaneous applications, register yourself on the university's employment platforms, job fairs, references of collaborators or ex-collaborators, workshops and partnerships to be contacted by Prime Engineering Italia, enter a contract with us (work, provision of services or other), fill your customer's form or communicate with our customer support teams.

If you are a **candidate**, aiming to identify and find the best job opportunities and/or possible services adapted to you, we have to handle certain information about you.

We only request data that will be relevant to us, such as your name, age, contact data, information on training, employment history, emergency contact, immigration status, financial information (in case we need to verify the financial context) and social security number (and, obviously, you may opt to share with us other relevant information). When it is appropriate, and accordingly with the law, we may also gather diverse information or data on any criminal convictions.

If you are a **client**, we need to gather and use information about you or about the people of your company in the scope of our provision of services, in order to provide you with a service as complete as possible, and so that our contractual relationship may progress correctly. As so, in this scope, we may request some personal data such as your name, email address, position and contact number of relevant employees for the provision of services.

If you're a **supplier**, we need a small amount of information concerning your personal data in order to ensure that everything works correctly. We need the contact data of certain people of your company, so we can communicate with you, as well as other information, such as your bank data, so we can pay you for the services provided (if that is part of the contractual provisions entered into between us). We may also hold information that someone in your company has chosen to share with us.

When we talk about suppliers, we aim to include any companies (including traders working individually) and atypical service providers, such as independent contractors and freelance workers, who provide services to Prime Engineering Italia. Under certain circumstances, Prime Engineering Italia shall subcontract the services provided to customers to third-party suppliers that perform their services on behalf of Prime Engineering Italia. In this context, the suppliers who are traders working individually, freelance workers or suppliers' collaborators shall be treated as candidates for the purposes of data protection. Be aware that, in this context, Prime Engineering Italia demands that the suppliers inform their collaborators of the relevant parts of this Privacy Policy (namely the sections aimed at the candidates).

Certain personal data categories, such as the ones which reveal the racial or ethnic origin, political opinions, religious or philosophic beliefs or the union membership, the genetic data, the biometric data to unquestionably identify a person, the data concerning health, sexual life or sexual orientation, are classified as "special categories of personal data" and benefit from an additional protection under the terms of the **General Data Protection Regulation ("GDPR")**. Prime Engineering Italia limits, as much as possible, the circumstances in which it gathers and handles these special categories of data, only doing so when your consent has been given.

In order to give our users a greater speed and customisation of the services provided by Prime Engineering Italia, this company shall resort to a browser operation called "cookies", which allows Prime Engineering Italia to customise your services and

website accordingly to your interests and needs, enabling the optimisation of your future activities and experience on the Prime Engineering Italia website. Therefore, data concerning parameters and configuration of your browser, operating system and geolocation may be gathered. During part of your browsing on the Prime Engineering Italia website, we may also use software tools to measure and gather information about the session, including response times of the pages, download errors, duration of the visit to certain pages, information concerning your interaction with them and methods used to leave them. We may also gather technical information to help us identify your device for purposes of fraud prevention and diagnosis.

C) PURPOSES AND GROUNDS FOR THE HANDLING OF YOUR PERSONAL DATA
The purposes and grounds on which Prime Engineering Italia handles your personal data depend on your quality as a candidate, collaborator or supplier.

If you are a candidate (where we include suppliers, which are traders working individually, freelance workers or suppliers' collaborators), please know that your personal data is gathered and handled, namely, for the following purposes:

Recruitment – includes recruiting activities for the provision of services or back-office functions, such as research and selection. In the case of provision of services, there is an approach to current and potential Prime Engineering Italia customers, aiming to find an opportunity, be placed at Prime Engineering Italia, as well as related activities. In this scope, data concerning the processing of salaries and human resources management will also be handled.

Contract execution – includes activities such as entering contracts with Prime Engineering Italia and partners, as well as the communication with third parties involved in the contracts (insurance companies, beneficiaries, intermediates).

Service development and improvement – includes the necessary activities for the development and improvement of the services provided by Prime Engineering Italia, analysis of the activity and processing for potential future opportunities.

If you're a **supplier** or a **client**, your personal data is gathered and handled, namely, for the following purposes:

Contract execution – includes all the necessary activities for the execution of the provision of services contract, namely, concerning the payment processing.

Communications – includes the necessary contacts so we can contact you about our contracts.

Service development and improvement – includes the necessary activities for the development and improvement of the services provided to or by Prime Engineering

Italia, analysis of the activity, processing for statistical and scientific purposes, as well as to offer you services and obtain support and services from you.

Compliance with the legal obligations.

In certain circumstances, to help us with the statement, exercise or defence of a right.

Prime Engineering Italia may resort to **third parties**, external service providers, which operate on behalf of Prime Engineering Italia, such as companies which hold and operate the Prime Engineering Italia website, process payments, analyze data, provide services to the customer, and sponsors and other third parties which directly collaborate with the activity developed by Prime Engineering Italia, so that your personal data may be handled by these third parties for the purposes described on this Privacy Policy. These third entities shall process your personal data accordingly with this Privacy Policy and the applicable law.

When we gather your personal data for the above-mentioned purposes or for other purposes, we inform you previously or at the moment of the gathering, and we aim to get your consent whenever necessary to legitimise the handling of your data. When you have consented to the handling activities, you shall have the right to withdraw your consent at any time.

Nevertheless, there may be some cases in which it is not your consent that legitimises the handling of your personal data, but one of the following grounds:

When handling is necessary to enter a contract with you or carry out its execution.

When the handling is necessary for the compliance with the legal obligations to which Prime Engineering Italia is subject.

When the handling is necessary to reach a legitimate interest sustained by Prime Engineering Italia, which doesn't endanger your interests, rights and fundamental freedoms that demand the protection of personal data – this legal base shall only be used if there is no less intrusive way to handle your personal data. We can assure that if the legitimate interest is used as a reason to handle your personal data, we shall keep a registry of this action, and you shall have the right to request this information.

When the handling is necessary for purposes of declaration, exercise or defence of a right in a legal process.

Prime
ENGINEERING

D) THE SAFETY OF YOUR PERSONAL DATA
Prime Engineering Italia uses all the possible measures to ensure the confidentiality and safety of your personal data, carrying out all the efforts and safety measures to protect your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.

Our measures include the implementation of appropriate access control to ensure that we encrypt, pseudonymize and make anonymous the personal data whenever possible.

Access to your personal data is only allowed on the above-mentioned terms, always according to the effective need of your knowledge, and subject to strict contractual confidentiality obligations whenever processed by third parties.

Even though the data transfer through the internet or website may not ensure complete safety against intrusions, Prime Engineering Italia and its service providers use their best efforts to implement and maintain physical, electronic and procedural safety measures aimed to protect your personal data, accordingly with the applicable data protection requirements.

E) STORAGE PERIOD OF YOUR PERSONAL DATA
Prime Engineering Italia shall store your data only for the strictly necessary time to fulfil the purpose for which they have been gathered.

Namely, in the case of the personal data gathered on the scope of recruitment processes, these shall be stored for a period of **10 (ten) years** after the last contact with the candidate.

In the case of the personal data of our suppliers and customers, they shall be stored for a period of **10 (ten) years**.

F) WITH WHOM WILL YOUR PERSONAL DATA BE SHARED
Prime Engineering Italia is comprised of a business group, so your data may be disclosed to other companies of the group within the context of the provision of services shared between the companies of the group and for purposes of internal report.

With the Candidate's consent, personal data may be shared with companies belonging to the same business group for the purpose of presenting open employment opportunities that match the Candidate's skill profile. The list of companies within the same business group can be consulted at **https://weareprimegroup.com/brands**

On the other hand, your personal data may be shared with our clients in the scope of technological consulting services.

As mentioned in **Point C of this Privacy Policy**, your personal data may be shared with external service providers that operate on behalf of Prime Engineering Italia. In this scope, your personal data shall be shared with the companies currently subcontracted by Prime Engineering Italia, as well as with other service providers to which we may resort in the future.

Pursuant to the applicable law, Prime Engineering Italia is bound to disclose data to the Tax Administration, Social Security, Work Conditions Authority and, in the aftermath of judicial mandates, to the legal authorities.

G) INTERNATIONAL DATA TRANSFERS

Prime Engineering Italia shares your personal data internally or with third parties for the purposes described in this Privacy Policy.

Prime Engineering Italia shall only send personal data gathered within the European Economic Area (EEA) to foreign countries in cases in which this is necessary to follow their instructions, comply with a legal obligation or work with agents and consultants that help us manage our businesses and services.

If a personal data transfer to the exterior of the EEA occurs, Prime Engineering Italia shall ensure that these are protected as if they were being used in the EEA. For this purpose, we shall use one of the following safeguards:

Transfer to a country not belonging to the EEA which privacy legislation ensuring an adequate level of personal data protection similar to the ones on the EEA.

Implementation of a contract with the foreign authority which binds them to protect the personal data according to the same standards used in the EEA.

Transfer of personal data to organisations with specific agreements of international data transfers with the European Union (for instance, the Privacy Shield, a structure which defines standards of data privacy shared between the United States and the European countries).

H) WHICH ARE YOUR RIGHTS?

As holder of your personal data, you are granted a set of rights concerning your personal data and the way they are handled, as follows:

Right of opposition – that is, the right to oppose, at any moment, for reasons concerning your individual situation, to the handling of your personal data, under the terms of the GDPR.

Right of information – that is, the right that you are granted concise, transparent, understandable and easy-to-access information, using clear and simple language,

about the way we use your personal data and about your rights.

Right of access – that is, the right to access, at all times, to your personal data.

Right of rectification – that is, the right to rectify your inaccurate personal data or complete it if they are incomplete.

Right of limitation – In certain situations, the holder of the data has the right to limit the handling of your personal data.

Right of deletion – In certain situations, the holder of the data has the right to be responsible for the handling and deletion of their personal data, with no justified delay.

Right of portability of your personal data – that is, the right to receive your personal data or the data you have provided, in a structured format, of current use and automatic reading, as well as the right to transfer these data to another responsible for the handling, in certain situations.

Right to present a claim to the control authority on the way we handle your personal data – which shall be the Italian Data Protection Authority (Garante per la protezione dei dati personali), domiciled at Piazza Venezia 11 – 00187 Roma (Italy), telephone +39 06.696771, email address protocollo@gnpd.it.

Right to withdraw your consent – in this case, the withdrawal of the consent doesn't compromise the lawfulness of the performed handling based on the previously given consent.

Right to not be subject to decisions uniquely based on automated processes which produce legal effects or other significant effects**.**

The above-mentioned rights may be exercised at all times through a communication sent to PrimeIT Italia S.R.L, for the contacts established on this Privacy Policy.

Your requests will be handled with exceptional care to ensure the efficiency of your rights.

You may be requested to prove your identity in order to ensure that the sharing of personal data is only carried out with its holder.

I) CONTACT DETAILS CONCERNING PRIME ENGINEERING ITALIA

If you have any questions about this Privacy Policy or about the handling and use we carry out with your personal data, or if you want to present a claim on a possible breach of the privacy laws, please contact the person responsible for the data

handling through the email address **gdpr@primeengineering.it**, or through the postal address **Strada 6, Edificio A13, 20057 Assago, Milano**.

Prime Engineering Italia will update this Privacy Policy whenever necessary to reflect the feedback of the data holders, and the changes on your services, as well as to comply with all the requirements legally required.

In the case these alterations imply a significant modification of this Privacy Policy, the data holders shall be duly notified, and their consent might be requested whenever necessary. Your satisfaction is very important to us. As such, don't hesitate to contact us with any questions you might have, through the indicated contacts.