

# **Privacy Policy**

**DISCLAIMER:** it is your right to be properly informed, but, sometimes, a Privacy Policy might seem not easy to read, understand and navigate. For this reason, CROMSOURCE, through colours, tables and the "easy navigate" internal link, ensures that reading this Privacy Policy is a <u>pleasant experience.</u>

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# 1. Why a Privacy Policy for you, users of our web sites: CROMSOURCE and TalentSource Life Sciences (a CROMSOURCE division)

This page shows our CROMSOURCE Privacy Policy, describing the management of websites of CROMSOURCE and TalentSource Life Sciences (a CROMSOURCE division), as regards processing the personal data of you, as users that visit us via web.

This **Privacy Policy** sets out how we, CROMSOURCE, use and protect any information that you give to us when you use our websites and it constitutes an informative to the data subjects under the terms of art. 13 of the GDPR.

This informative is provided to any entity having to do with the web-based services made available by CROMSOURCE via electronic networks as from the following addresses:

www.cromsource.com

www.talentsourcelifesciences.com

which are the home pages of our official websites (CROMSOURCE and TalentSource Life Sciences - a CROMSOURCE division).

CROMSOURCE takes its users' privacy very seriously and undertakes to comply in full with the applicable law (Regulation (EU) 2016/679 – hereinafter defined as the "GDPR").

CROMSOURCE is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy Policy.

#### 2. Identification of the Controller and of the Data Protection officer (DPO)

The Data Controllers are **CROMSOURCE srl** with registered offices in **Via Giorgio De Sandre**, **3 – 37135 Verona**, **Italy** and the following other entities of the group:

• CROMSOURCE ADM S.r.l., a company organized under the laws of Italy with registered office at Via Giorgio De Sandre 3, 37135, Verona, Italy;



- CROMSOURCE BV, a company organized under the laws of Belgium with registered office at Mechelsesteenweg 455 Bus 5, 1950, Kraainem, Belgium;
- CROMSOURCE GmBh, a company organized under the laws of Germany with registered office at Borchersstraße 20 Etage B2 52072, Aachen, Germany;
- CROMSOURCE S.I.u., a company organized under the laws of Spain with registered office at Marqués de Urquijo 26 3° Izqda, 28008, Madrid, Spain;
- CROMSOURCE BV, a company organized under the laws of The Netherlands with registered office at Kingsfordweg 151, 1043 GR, Amsterdam, The Netherlands;
- CROMSOURCE Sp.z.o.o., a company organized under the laws of Poland with registered office at ul. Gen. Józefa Zajączka 32, 01-510, Warszawa, Poland;
- CROMSOURCE Ltd., a company organized under the laws of Switzerland with registered office at Via Serafino Balestra, 18 6901 Lugano, Switzerland;
- CROMSOURCE Ltd, a company organized under the laws of England with registered office at 6-9 The Square, Stockley Park, Hayes, Uxbridge UB11 1FW, United Kingdom;

The above listed entities are jointly defined herein as "CROMSOURCE".

The Data Protection Officer ("DPO") can be contacted at the following address: <a href="mailto:privacy@cromsource.com">privacy@cromsource.com</a>

You can always contact us for receiving more detailed information on how we process your data.

#### 3. Rules for Privacy Policy updates

This policy is effective from 16 March 2023.

CROMSOURCE may change this Privacy Policy from time to time by updating this page.

You should check this page from time to time to ensure that you are happy with any changes.

You can determine if this Privacy Policy has been revised since your last visit by referring to the version and date in the header of each page.



If changes will be particularly relevant, we will make a more visible notification.

Your use of our websites after any update of this Policy constitutes your acceptance of the terms of the revised Privacy Policy, and you should therefore review the Privacy Policy regularly to ensure that you are aware of its terms.

You can at any time exercise your rights, in particular the rights to unsubscribed/sign off or object to processing: please refer to the sections "10. Your Rights".

#### 4. Personnel authorized to process your data

Accesses to your data and to the tools processing them are at all times restricted to appropriately authorized personnel.

The personnel who receive your data shall perform processing as Data Controller, Data Processor or otherwise authorized persons, as the case may be, for the purposes indicated below and in compliance with the applicable data protection law.

The information you provide to us will be available to CROMSOURCE, its subsidiaries and third parties working with or on behalf of CROMSOURCE.

CROMSOURCE may provide any or all collected information to a third party in connection with the sale, assignment, or other transfer of the business of the particular website to which the information relates if such third party agrees to treat all such information substantially in accordance with this Privacy Policy.

CROMSOURCE may be obliged to disclose certain personal information data to third parties - such as Government Authorities, institutions, authorities, public bodies for their institutional purposes - also in Third Countries.

It may also be necessary to disclose personal information data so as to protect the legal interests and other rights of CROMSOURCE, subject to local legal requirements. CROMSOURCE reserves the right to disclose all information collected to the extent required by law or to respond to judicial process.

All the above mentioned authorized personnel shall only receive the data necessary for their respective functions and shall duly undertake to process only for the purposes indicated above and in compliance with data protection laws. The data can furthermore be communicated



to the other legitimate recipients identified from time to time by the applicable laws. With the exception of the foregoing, the Data shall not be shared with third parties, whether legal or natural persons, who do not perform any function.

Except as set forth in this Privacy Policy, CROMSOURCE will not trade, sell, release, share or transfer your personal information for use by any business outside the CROMSOURCE organization without your consent, or in a form other than what was disclosed to you at the time the information was collected, unless permitted or required by law.

Read in details about authorized recipients of your data and places where your data are processed, including transfer to Third Countries below.

#### → to CROMSOURCE and its subsidiaries

To operate as a global business it may be necessary to process and transfer personal information data within CROMSOURCE businesses. All CROMSOURCE premises can be found at the following link:

https://www.cromsource.com/about-us/locations/

Persons belonging to the following categories are authorized to process the user's data: technical and administrative staff, IT staff, Business and Development personnel, Human resources, CROMSOURCE core business personnel, including TalentSource Life Sciences, etc., as well as other staff members who require processing the data for performance of their job duties.

#### → to third parties working with or on behalf of CROMSOURCE

It may be necessary to disclose certain personal information data to a supplier or contractor organisation supplying services which require the use of personal information data.

The Data can be communicated, also in Third Countries, to professionals, independent consultants – working individually or in partnerships - and other third parties and providers which supply to the Company commercial, professional or technical services required to operate the Website (e.g., provision of IT and Cloud Computing services) for the purposes specified below and to support CROMSOURCE with the provision of the services you requested.



In particular, data will be disclosed to Hunter Bevan Ltd. of The Studio, Mountain View, Knockin, Shropshire SY10 8HU, UK – appointed as Data Processor, in charge of the IT maintenance of the site and for the maintenance of the databases in which your data will be stored.

Data can be disclosed to third parties in the event of mergers, acquisitions, transfers of business -or branches thereof-, audits or other extraordinary operations.

#### → to other third parties

CROMSOURCE may be obliged to disclose certain personal information data to third parties - such as Government Authorities, institutions, authorities, public bodies for their institutional purposes - also in Third Countries.

It may also be necessary to disclose personal information data so as to protect the legal interests and other rights of CROMSOURCE, subject to local legal requirements.

#### 5. Places where your data are processed, including transfer to Third Countries

Disclosing your data to the above described personnel may involve transferring personal information data outside the European Economic Area (EEA) to the USA and elsewhere, including countries whose laws do not guarantee the same level of protection to personal data privacy as that afforded by EU Law.

Regarding any transfer of Data outside the EU, including in countries whose laws do not guarantee the same level of protection to personal data privacy as that afforded by EU Law, CROMSOURCE informs that the transfer shall in any event take place in accordance with the methods permitted by the GDPR, such as, for example, on the basis of the user's consent, on the basis of the Standard Contractual Clauses approved by the European Commission, by selecting parties enrolled in international programs for free movement of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.



#### 6. DATA collected and lawfulness - CROMSOURCE web site

When you contact CROMSOURCE via our websites to request or to access information, you are asked to provide your personal data.

CROMSOURCE will collect information through our websites that can identify you (if provided by you), such as, but not limited to, your name, surname, and job title, contact information including Company email, address, demographic information such as postcode, city, country, preferences and interests other information relevant to customer surveys and/or offers.

CROMSOURCE can collect also other information (if provided by you) in the different modules for information collection: labels in this forms will transparently and unambiguously indicate which type of data we collect and if they are mandatory or not for providing the services required.

Data collection respects the data minimization: we will collect only your date if strictly connected to the service you are requesting.

CROMSOURCE may use this information to respond to your requests for information, products or services. CROMSOURCE may also collect information that will usually not allow us to identify you, such as information gathered through "**cookies**" (see below).

Data collection is legally based on any consent you will provide us based on the present informative.

Collection of data voluntary given by you sending messages to the addresses mentioned in this website for accesses our services, is done on the bases of your freely chosen explicit and voluntary decision to give us your data based on the present informative.

CROMSOURCE will process your data only in respect to the processing needs/scope detailed in this informative.

Please read carefully the informative for each type of processing as detailed in the paragraphs below.



## 6.1 Informative for the Data Processing via "Contact us" section

Data Collected	CROMSOURCE collects, through this webpage, information that can identify you such as, but not limited to, your
	name, surname, contact information including Company email address demographic information such as
	postcode, city, country
Data Collected -	In the field marked as "not mandatory", CROMSOURCE can collect also other information, such as messages,
not mandatory	notes and comments, but only if provided by you: CROMSOURCE will process all the information you will freely
	decide to write in the field marked as "not mandatory" such as, but not limited to preferences and interests.
Type of Processing	CROMSOURCE will process these data electronically and in paper.
Purposes of the	CROMSOURCE process this information:
processing	<ul> <li>to understand your needs and provide you required information, if any</li> </ul>
	<ul> <li>to provide you with a better service, improving our products and services.</li> </ul>
	We may periodically send promotional emails about new products, special offers or other information which we
	think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may
	contact you by email, phone, fax or mail. We may use the information to customise the website according to your
	interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such
	direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	Two subject to a decision based solely on automated processing
including profiling	
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes
	mentioned above. This period is considered sufficient also for complying to any obligation to which
	CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized	The information you provide to us will be available to authorized CROMSOURCE personnel and of its
personnel	subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data



Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability.</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>

## 6.2 Informative for the Data Processing via "Get a quotation" section

Data Collected	CROMSOURCE collects, through this webpage, information that can identify you such as, but not limited to, your name, surname, and contact information including Company email address demographic information such as
	postcode, city, and country.
Data Collected – not mandatory	In the field marked as "not mandatory", CROMSOURCE can collect also other information, such as messages, notes and comments, but only if provided by you: CROMSOURCE will process all the information you will freely decide to write in the field marked as "not mandatory" such as, but not limited to preferences and interests.
	This includes also confidential information reported in customer documents such as the Study Information or Protocol
Type of Processing	CROMSOURCE will process these data electronically and in paper.
Purposes of the processing	CROMSOURCE process this information:         - to understand your needs and provide you required information, if any         - to provide you with a better service, improving our products and services.  We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.



	From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.  Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	You have the right to: - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal - lodge a complaint with a supervisory authority.  Please refer also to paragraph 10. Your Rights



## 6.3 Informative for the Data Processing via "Locations" section

Data Collected	CROMSOURCE collects all the information freely given by you by contacting CROMSOURCE via phone, post
	mail and e-mail, using the CROMSOURCE contacts details reported in site
Data Collected -	Not applicable
not mandatory	
Type of Processing	
Purposes of the	CROMSOURCE processes this information:
processing	<ul> <li>to understand your needs and provide you required information, if any</li> </ul>
	<ul> <li>to provide you with a better service, improving our products and services.</li> </ul>
	We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.  From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and personnel of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries



Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability.</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> </ul>
	Please refer also to paragraph 10. Your Rights

## 6.4 Informative for the Data Processing via "Publication Download" section

Data Collected	CROMSOURCE collects, through this webpage, information that can identify you such as your name, surname,
	Company and contact details.
Data Collected -	Not applicable
not mandatory	
Type of Processing	CROMSOURCE will process these data electronically and in paper.
Purposes of the	CROMSOURCE process this information:
processing	- to understand your needs and provide you required information, if any
	- to provide you with a better service, improving our products and services.
	We may periodically send promotional emails about new products, special offers or other information which we
	think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	



Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability.</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>

## 6.5 Informative for the Data Processing via "Events" section

Data Collected	CROMSOURCE can collect, through this webpage, information that can identify you such as your name,
	surname, Company and contact details.
Data Collected –	Not applicable
not mandatory	
Type of Processing	CROMSOURCE will process these data electronically and in paper.
Purposes of the	CROMSOURCE process this information:
processing	- to understand your needs and provide you required information, if any
	<ul> <li>to provide you with a better service, improving our products and services.</li> </ul>



	We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.  From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such
	direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>



## 6.6 Informative for the Data Processing via "Apply for a JOB" section

Data Collected	CROMSOURCE collects, through this webpage, information that can identify you such as, but not limited to, your name, surname; contact information including email address; demographic information such as address, postcode, city, and country.  We may collect also other information: when you upload your CV in the dedicated section, CROMSOURCE collects all the information reported in the CV: your education, past working experience but also pictures, hobbies, preferences and interests and any data belonging to particular category of data.
Data Collected – not mandatory	In the field marked as not mandatory, CROMSOURCE can collect also other information like phone number, but only if provided by you.  You should know that CROMSOURCE will process all the information you will freely decide to write in the field
Type of Processing	marked as not mandatory (such as, but not limited to) preferences and interests.
Type of Processing Purposes of the	CROMSOURCE will process these data electronically and in paper.  CROMSOURCE process this information:
processing and	- for the purposes of the recruitment based on your consent
applicable legal basis	<ul> <li>to share your data with third parties, if needed, in relation to the recruitment process (e.g. recruitment agencies, background check agencies);</li> <li>for carrying out the obligations and exercising specific rights of the controller or of the data subject in the</li> </ul>
	field of employment as per applicable laws
	- to understand your needs and provide you required information, if any
	- to provide you with a better service, improving our products and services.
	We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.



Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	With your consent, data will be retain for a period (4 years) allowing CROMSOURCE to process your data for the purposes mentioned above and to present you with additional work offer if the possibility arise. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage resources data.  Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>

# **6.7 Informative for the Data Processing via "Investigators" section**

Data Collected	CROMSOURCE collects, through this webpage, information that can identify you such as, but not limited to, your
	name, surname, contact information including Company, email address, demographic information such as
	postcode, city and country.



Data Callegae	In the field would do not recorded by CDOMCOLIDOR and called allow other information, but only if any ideal by
Data Collected -	In the field marked as not mandatory, CROMSOURCE can collect also other information, but only if provided by
not mandatory	you.
	You should know that CROMSOURCE will process all the information you will freely decide to write in the field
	marked as not mandatory (such as, but not limited to) preferences and interests.
Type of Processing	CROMSOURCE will process these data electronically and in paper.
Purposes of the	CROMSOURCE process this information:
processing	- to understand your needs and provide you required information, if any
-	- to provide you with a better service, improving our products and services.
	We may periodically send promotional emails about new products, special offers or other information which we
	think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may
	contact you by email, phone, fax or mail. We may use the information to customise the website according to your
	interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such
	direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in
	the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes
	mentioned above. This period is considered sufficient also for complying to any obligation to which
	CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized	The information you provide to us will be available to authorized CROMSOURCE personnel and of its
personnel	subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
personner	
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
processing	
Rights	You have the right to:
	- request from the controller access to our data, rectification or erasure or restriction of processing of your
	data or to object to processing as well as the right to data portability



<ul> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul>
Please refer also to paragraph 10. Your Rights

#### 7. DATA collected and lawfulness - TalentSource Life Sciences (a CROMSOURCE Division) web site

Please read carefully the specific informative for each type of processing as detailed in the paragraphs below.

#### 7.1 TalentSource Life Sciences- Informative for the Data Processing via "Apply for a JOB" section

Data Collected	CROMSOURCE, via TalentSource Life Sciences website, collects, through this webpage, information that can identify you such as, but not limited to, your name, surname; contact information including email address; demographic information such as address, postcode, city, and country.
	We may collect also other information: when you upload your CV in the dedicated section, we collects all the information reported in the CV: your education, past working experience but also pictures, hobbies, preferences and interests and any data belonging to particular category of data.
Data Collected – not mandatory	In the field marked as not mandatory, we can collect also other information like phone number, but only if provided by you.
	You should know that we will process all the information you will freely decide to write in the field marked as not mandatory (such as, but not limited to) preferences and interests.
Type of Processing	CROMSOURCE, via TalentSource Life Sciences website, will process these data electronically and in paper.



Purposes of the processing and the applicable legal basis	CROMSOURCE, via TalentSource Life Sciences website, process this information:  - for the purposes of the recruitment based on your consent  - to share your data with third parties, if needed, in relation to the recruitment process (e.g. recruitment agencies, background check agencies);  - for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment as per applicable laws;  - to understand your needs and provide you required information, if any - to provide you with a better service, improving our products and services.  We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.  From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	With your consent, data will be retain for a period (4 years) allowing CROMSOURCE, via TalentSource Life Sciences website, to process your data for the purposes mentioned above and to present you with additional work offer if the possibility arise. This period is considered sufficient also for complying to any obligation to which TALENTSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage resources data.  Please refer also to paragraph 4. Personnel authorized to process your data
Location of the	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
processing	
Rights	You have the right to:



<ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul>
Please refer also to paragraph 10. Your Rights

## 7.2 TalentSource Life Sciences - Informative for the Data Processing via "Create an account" section

Data Collected	CROMSOURCE, via TalentSource Life Sciences website, collects, through this webpage, information that can identify you such as, but not limited to, your name, surname; contact information including email address; demographic information such as address, postcode, city, and country.
Data Collected – not mandatory	In the field marked as not mandatory, we can collect also other information like phone number, but only if provided by you.
	You should know that we will process all the information you will freely decide to write in the field marked as not mandatory (such as, but not limited to) preferences and interests.
Type of Processing	CROMSOURCE, via TalentSource Life Sciences website, will process these data electronically and in paper.
Purposes of the processing	<ul> <li>CROMSOURCE, via TalentSource Life Sciences website, process this information:         <ul> <li>for creating and account to access our services</li> <li>for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment</li> <li>to understand your needs and provide you required information, if any</li> <li>to provide you with a better service, improving our products and services.</li> </ul> </li> <li>We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.</li> </ul>



	From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated decision-making, including profiling	Not subject to a decision based solely on automated processing
Retention time	Data will be retain for a period (4 years) allowing CROMSOURCE, via TalentSource Life Sciences website, to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which TALENTSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage resources data.  Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>



## 7.3 TalentSource Life Sciences - Informative for the Data Processing via "Contact us" section

Data Collected	CROMSOURCE, via TalentSource Life Sciences website, collects, through this webpage, information that can identify you such as, but not limited to, your name, surname, contact information including email address demographic information such as postcode, city, country  We may collect also other information: when you upload your CV in the dedicated section, we collects all the information reported in the CV: your education, past working experience but also pictures, hobbies, preferences
Data Callagtad	and interests and any data belonging to particular category of data.
Data Collected –	In the field marked as "not mandatory", CROMSOURCE can collect also other information, such as messages,
not mandatory	notes and comments, but only if provided by you: CROMSOURCE will process all the information you will freely decide to write in the field marked as "not mandatory" such as, but not limited to preferences and interests.
Type of Processing	CROMSOURCE, via TalentSource Life Sciences website, will process these data electronically and in paper.
Purposes of the	CROMSOURCE, via TalentSource Life Sciences website, process this information:
processing	- to understand your needs and provide you required information, if any
	- to provide you with a better service, improving our products and services
	- for the purposes of the recruitment
	<ul> <li>for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment</li> </ul>
	We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may
	contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such
	direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	



Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
Rights	<ul> <li>You have the right to: <ul> <li>request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability</li> <li>withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal</li> <li>lodge a complaint with a supervisory authority.</li> </ul> </li> <li>Please refer also to paragraph 10. Your Rights</li> </ul>

## 7.4 TalentSource Life Sciences - Informative for the Data Processing when you contact us using contact details in our website

Data Collected	CROMSOURCE, via TalentSource Life Sciences website, collects all the information freely given by you by contacting CROMSOURCE via phone, post mail and e-mail, using the CROMSOURCE contacts details reported in site
Data Collected –	NA NA
not mandatory	
Type of Processing	CROMSOURCE, via TalentSource Life Sciences website will process these data electronically and in paper.
Purposes of the	CROMSOURCE, via TalentSource Life Sciences website process this information:
processing	- to understand your needs and provide you required information, if any
	- to provide you with a better service, improving our products and services.



	We may periodically send promotional emails about new products, special offers or other information which we
	think you may find interesting using the email address which you have provided.
	From time to time, we may also use your information to contact you for market research purposes. We may
	contact you by email, phone, fax or mail. We may use the information to customise the website according to your
	interests.
	Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such
	direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in
	the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes
reterrition time	mentioned above. This period is considered sufficient also for complying to any obligation to which
<u> </u>	CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized	The information you provide to us will be available to authorized CROMSOURCE personnel and of its
personnel	subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries
processing	January Company of the Company of th
Rights	You have the right to:
	- request from the controller access to our data, rectification or erasure or restriction of processing of your
	data or to object to processing as well as the right to data portability
	- withdraw any given consent at any time, without affecting the lawfulness of processing based on consent
	before its withdrawal
	- lodge a complaint with a supervisory authority.
	Please refer also to paragraph 10. Your Rights



## 7.5 Informative for the Data Processing via "Events" section

Data Collected	CROMSOURCE, via TalentsSource Life Sciences website, can collect, through this webpage, information that
	can identify you such as your name, surname, Company and contact details.
Data Collected -	NA NA
not mandatory	
Type of Processing	
Purposes of the	CROMSOURCE, via TalentsSource Life Sciences website, process this information:
processing	<ul> <li>to understand your needs and provide you required information, if any</li> </ul>
	<ul> <li>to provide you with a better service, improving our products and services.</li> </ul>
	We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.  From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your interests.  Under this circumstances, you will be explicitly reminded to have the right to object to such processing to such direct marketing, while maintaining, if you want all the advantages to be contacted for the purposes detailed in the above bullet point.
Automated	Not subject to a decision based solely on automated processing
decision-making,	
including profiling	
Retention time	Data will be retain for a period (30 years) allowing CROMSOURCE to process your data for the purposes mentioned above. This period is considered sufficient also for complying to any obligation to which CROMSOURCE is subject, including any establishment, exercise or defense of legal claims.
Authorized personnel	The information you provide to us will be available to authorized CROMSOURCE personnel and of its subsidiaries and to authorized parties working with or on behalf of CROMSOURCE to manage the enquiry.
	Please refer also to paragraph 4. Personnel authorized to process your data
Location of the processing	Please refer to paragraph 5. Places where your data are processed, including transfer to Third Countries



Rights	You have the right to: - request from the controller access to our data, rectification or erasure or restriction of processing of your data or to object to processing as well as the right to data portability - withdraw any given consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal - lodge a complaint with a supervisory authority.
	Please refer also to paragraph 10. Your Rights

#### 8. Involved tools, Security and Limitation Restriction

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

CROMSOURCE takes reasonable measures to maintain the confidentiality of your personal information regardless of the country where such information is stored or transferred to.

In compliance with Article 5.1.(c) of the GDPR, the computers and programs used by CROMSOURCE are set up in such a way to reduce the use of personal and identifying data to a minimum.

Such data are processed only to the extent required to achieve the purposes indicated in this Policy, and will be stored for as long as strictly necessary for achievement of the specific purposes pursued - in any event, the criterion used to determine the storage period is based on compliance with time limits permitted by law and the principles of data minimization, storage limitation or rational management of our records.



#### 9. Cookies

The purpose of this cookies policy is to provide clear and precise information about the cookies used on our website.

Cookies and other similar technologies are tools used by web servers to store and recover information about website visitors, and also to ensure correct functioning of the website. The cookies do not tell us who you are, but can give us some information about how the users interact with the website, and give you a more personalized web experience.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

We use own and third-party cookies to improve our services, customise our website, make it easier for our users to browse, offer an improved experience when using the website, identify problems and thereby improve the website, carry out measurements and usage statistics.

We inform you that we can use cookies on your device provided you have given your consent, except in those cases where the cookies are necessary to browse our website. If you give your consent, we will be able to use cookies that will allow us to gather more information about your preferences and customise our website according to your individual interests.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer, or to manage the types of cookies you will allow. This may, however, prevent you from taking full advantage of the website. As there are many different web browsers, please consult your own web browser settings to manage cookies.

If at any time you change your mind about our use of cookies after accepting them, please consult your own web browser settings to manage cookies or visit the Cookie Preferences area.



#### 9.1 Cookies for CROMSOURCE website

**Necessary** (8): Necessary cookies are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
_wpdm_client	cromsource.com	Records when documents were downloaded from the site and by which browser and operating system.	Session	HTTP
cookielawinfo-checkbox- analytics	cromsource.com	The cookie is set by the GDPR Cookie Consent plugin to record the user consent for the cookies in the category "Analytics".	1 year	HTML
cookielawinfo-checkbox- necessary	cromsource.com	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Necessary" category.	1 year	HTML
CookieLawInfoConsent	cromsource.com	Records the default button state of the corresponding category & the status of CCPA. It works only in coordination with the primary cookie.	1 year	HTTP
viewed_cookie_policy- necessary	cromsource.com	The cookie is set by the GDPR Cookie Consent plugin to store whether or not the user has consented to the use of cookies. It does not store any personal data.	1 year	HTML
mtv1Pulse cromsource.com		The cookie is used to secure the website from unwanted bots and automated scripts and help verify human users. The cookie collect browser and widget configuration. The cookie do not track individuals and does not collect or store personally identifiable information.	Session	HTML
mtv1ConfSum	cromsource.com	The cookie is used to secure the website from unwanted bots and automated scripts and help verify human users. The cookie collect browser and widget configuration. The cookie do not track individuals and does not collect or store personally identifiable information.	Session	HTML
jsV	cromsource.com	The cookie is used to secure the website from unwanted bots and automated scripts and help verify human users. The cookie collect browser and widget configuration. The cookie do not track individuals and does not collect or store personally identifiable information.	Session	HTML



Other (1): Other uncategorized cookies are those that are being analysed and have not been classified into a category as yet...

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
hustle-hide-module-4	cromsource.com	The cookie is used by the Hustle plugin for Wordpress. This cookie is used to remember the user's preferences for how the marketing element should behave when they interact with it. Specifically, it is used to remember whether the element should be hidden or displayed again after a certain period of time. The cookie is set when the user interacts with the marketing element, and is deleted when the user closes their browser or logs out of the website.	Session	HTML

**Analytics** (3): Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc..

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
_gcl_au	cromsource.com	Provided by Google Tag Manager to experiment advertisement efficiency of websites using their services.	3 months	HTTP
_ga	cromsource.com	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years	HTTP
_ga_XHTJB3DQX7	cromsource.com	This cookie is installed by Google Analytics. This cookie is a Google Analytics persistent cookie which is used to distinguish sessions for a user.	2 years	НТТР

#### Use of Google Tag manager with consent from website visitor

We use the Google Tag Manager - provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The Google Tag Manager is a tool that allows us to embed tracking or statistical tools and other technologies on our website. The Google Tag Manager



itself does not create user profiles, does not store cookies and does not perform any independent analyses. It only serves to manage and play out the tools integrated via it. However, the Google Tag Manager records your IP address, which may also be transmitted to Google's parent company in the United States. The use of the Google Tag Manager is based on your consent acc. to Art. 6 (1) lit. a GDPR. Duration of storage: The Google Tag Manager does not store any data itself. It has no access to it. The Tag Manager only collects data on how individual tags are used. Google will store the data relevant for the function of Google Tag Manager for as long as it is necessary to fulfil the booked web service. The data collection and storage is anonymized. If there is a reference to a person, the data will be deleted immediately, as long as it is not subject to any legal storage obligations. In any case, the deletion takes place after the expiration of the retention obligation. If you later decide you wish to change your cookie preferences, you can visit our Cookie Preferences area.

#### Use of Google Analytics with consent from website visitors

This website uses Google Analytics – a web analytics service provided by Google Ireland Limited ("Google", Google Building Gordon House, Barrow St, Dublin 4, Ireland) – and obtains consent to do so from website visitors. Google Analytics uses so-called "cookies", i.e. text files that are stored on your computer and that enable your use of the website to be analysed. The information generated by the cookie about your use of this website is usually also transmitted to a Google server in the USA and saved there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services to website operators relating to website activity and Internet usage. We would like to point out that this website uses Google Analytics only after prior consent and with the abbreviated version of the IP addresses in order to exclude direct personal reference. If you later decide you wish to change your cookie preferences, you can visit our Cookie Preferences area.



#### 9.2 Cookies for TalentSource Life Sciences website

**Necessary** (4): Necessary cookies are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
cookielawinfo-checkbox- necessary	talentsourcelifesciences.com	Set by the GDPR Cookie Consent plugin, this cookie is used to record the user consent for the cookies in the "Necessary" category.	1 year	HTML
cookielawinfo-checkbox- analytics	talentsourcelifesciences.com	The cookie is set by the GDPR Cookie Consent plugin to record the user consent for the cookies in the category "Analytics".	1 year	HTTL
viewed_cookie_policy- necessary	talentsourcelifesciences.com	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.	1 year	HTML
CookieLawInfoConsent	talentsourcelifesciences.com	Records the default button state of the corresponding category & the status of CCPA. It works only in coordination with the primary cookie.	1 year	HTML

Other (1): Other uncategorized cookies are those that are being analysed and have not been classified into a category as yet..

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
hustle-hide-module-2	talentsourcelifesciences.com	The cookie is used by the Hustle plugin for Wordpress. This cookie is used to remember the user's preferences for how the marketing element should behave when they interact with it. Specifically, it is used to remember whether the element should be hidden or displayed again after a certain period of time. The cookie is set when the user interacts with the marketing element, and is deleted when the user closes their browser or logs out of the website.	Session	HTML



**Analytics** (2): Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc..

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
_ga	talentsourcelifesciences.com	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	2 years	НТТР
_ga_6Z9BFDBJE1	talentsourcelifesciences.com	This cookie is installed by Google Analytics. This cookie is a Google Analytics persistent cookie which is used to distinguish sessions for a user.	2 years	HTTP

#### Use of Google Analytics with consent from website visitors

This website uses Google Analytics – a web analytics service provided by Google Ireland Limited ("Google", Google Building Gordon House, Barrow St, Dublin 4, Ireland) – and obtains consent to do so from website visitors. Google Analytics uses so-called "cookies", i.e. text files that are stored on your computer and that enable your use of the website to be analyzed. The information generated by the cookie about your use of this website is usually also transmitted to a Google server in the USA and saved there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing other services to website operators relating to website activity and Internet usage. We would like to point out that this website uses Google Analytics only after prior consent and with the abbreviated version of the IP addresses in order to exclude direct personal reference. If you later decide you wish to change your cookie preferences, you can visit our Cookie Preferences area.

#### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over external websites. Therefore, we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.



#### 10. Your Rights

You, as user of our web site, have the right to:

- (a) request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- (b) the right to withdraw any consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (c) the right to lodge a complaint with a supervisory authority;
- (d) to know and understand whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether if you are obliged to provide the personal data and of the possible consequences of failure to provide such data;
- (e) to know and understand the existence or not of automated decision-making, including profiling

If CROMSOURCE intends to further process the personal data for a purpose other than that for which your personal data were collected, we will provide you, prior to that further processing, with information on that other purpose and with any relevant further information.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen

#### **Exercise your rights**

You may choose to restrict the collection or use of your personal information in the following ways: whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at privacy@cromsource.com

About direct marketing purposes, you may change your mind at any time and let us know by contacting us as follows

- Replying to the e-mail asking for not to be contacted anymore for direct marketing
- Writing to us at: CROMSOURCE Via Giorgio De Sandre, 3, 37135 Verona, Italy



Writing to us at: privacy@cromsource.com

You may request details of personal information which we hold about you under GDPR and any local applicable Regulation. An administrative fee will be payable, in compliance with the law.

If you would like a copy of the information held on you, please write to

CROMSOURCE Via Giorgio De Sandre, 3, 37135 Verona, Italy

privacy@cromsource.com

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.