

## NR COVIS S.R.L.

Sede Legale: 36010 CARRÈ (VI) – Via Astico, 1 – Tel. +39 0445 328488  
Sede Operativa: 28885 PIEDIMULERA (VB) – Via Area Artigianale Sassonia, 6 – Tel +39 0324 848700  
Cod.Fisc./P.IVA IT04339690242 - Cap. Soc. € 1.000.000,00 i.v.  
Reg.Impr. di Vicenza n. 04339690242 – R.E.A. n. 396920/Vicenza  
Pec: nrcovis@legalmail.it Website: www.nrcovis.it  
Società soggetta all'attività di direzione e coordinamento di Covis srl



## Information for employees

NR COVIS S.r.l. (hereinafter “Company”), VAT number 04339690242, as processing holder of personal data provided by you, pursuant to art. 13 of Regulation (UE) 216/679, informs you that:

1) the data controller is reachable via the following channels:

- e-mail [hr@covisgroup.it](mailto:hr@covisgroup.it)
- pec [nrcovis@legalmail.it](mailto:nrcovis@legalmail.it)

2) your personal data, indicated in point 10), are processed exclusively for the following purposes:

- a) manage the employment relationship between you and our company
- b) fulfil all obligations relating to: employment, social security, assistance, taxes, health and safety in the workplace
- c) manage the data of personnel belonging to the different companies of the Covis Group, for internal administrative purposes

The legal bases of the processing are:

- fulfilment of obligations arising from the employment contract between you and the Company, pursuant to Article 6, paragraph 1 letter b of Regulation (EU) 2016/679;
- the existence of legal obligations to which we are subject pursuant to Article 6 paragraph 1 letter c of Regulation (EU) 2016/679;
- the existence of a legitimate interest of the data controller, pursuant to Article 6 paragraph 1 letter f of the GDPR.

The sensitive personal data indicated in point 10) are processed without the need to obtain your express consent, pursuant to Regulation (EU) 2016/679 art. 6 letters b), c), exclusively for the following purposes:

- a) manage the employment relationship between you and our company
- b) fulfil all labour, social security, welfare, and tax obligations required by current laws and regulations, including those regarding health and safety in the workplace

The legal bases of the processing are:

- the existence of obligations and the exercise of specific rights in the field of labour law and social security and social protection pursuant to Regulation (EU) 2016/679, Article 9, paragraph 2, letter b)
- occupational medicine purposes, assessment of the employee's working capacity pursuant to Regulation (EU) 2016/679, Article 9, paragraph 2, letter h)

3) your personal data may be communicated to:

- other entities acting as independent data controllers
- **entities acting as joint data controllers (exclusively with regard to the "Training Activity Management" processing)**
- entities acting as data processors, assisting the Company in different activities related to its work. **The list of entities designated as data processors is available upon request, to be sent via the contact channels referred to in point 1).**

4) your personal data will not be transferred to third countries or international organizations.

5) your personal data will be stored for as long as necessary to fulfil the purpose for which they are collected.

6) at any time, you have the right to request us access to your personal data, rectification, or cancellation of your data if they have been processed in a manner that does not comply with applicable law, or limitation of its processing. To exercise your right, you must submit a request through one of the contact channels indicated in point 1).

7) in the event of a violation of your rights or incorrect processing of your personal data by our side, you have the right to contact the Data Protection Authority, which operates as the supervisory authority for the Italian territory.

8) Communication of personal data is a necessary requirement for the management of the employment relationship. Therefore, failure to provide such data will prevent us from continuing with the business relationship.

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9) your personal data will not be processed based on an automated decision-making process.

10) the personal data taken into consideration for the processing will be the following:

- common data: personal and contact information, data relating to your work performance
- data relating to your health status
- data relating to your membership in a trade union and/or political party or movement
- legal data in the event of a request for garnishment of one-fifth of your salary

If you have dependent family members, the processing will also concern their personal data (including sensitive data), to the extent strictly necessary in accordance with current tax legislation.

Find below the complete list of treatments and the detailed explanation of each of them.

Piedimulera, 30/12/2025

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**Extended information**

<b>PROCESSING</b>	<b>RECRUITMENT AND MANAGEMENT OF EMPLOYMENT RELATIONSHIPS</b>
<b>PURPOSE AND LEGAL BASIS</b>	<p>Purpose: fulfilment of specific obligations or performance of specific tasks established by European Union legislation, laws, regulations, or collective agreements, including company agreements, pursuant to internal law, in particular for the purposes of establishing, managing, and terminating employment relationships (Article 88 of EU Regulation 2016/679), as well as the granting of benefits or the provision of contributions.</p> <p>Legal basis for processing general data: performance of a contract pursuant to Article 6, paragraph 1, letter b) of the GDPR.</p> <p>Legal basis for special data processing: fulfilment of obligations and exercise of specific rights of the data controller or the data subject in the field of labour and social security law and social protection pursuant to Article 9, paragraph 1, letter b) of the GDPR. In particular, reference is made to the legislation regarding the right to work of persons with disabilities (Law 68/1999).</p>
<b>CLASSES OF INTERESTED PEOPLE</b>	Natural persons working for the Company as employees or collaborators
<b>TYPES OF DATA</b>	<p>General data: name and personal data; residential address; email address; telephone number; any disadvantages that give access to legal benefits; contractual status; working hours; duties performed; disciplinary measures.</p> <p>Special data (health related): any disabilities</p>
<b>CATEGORIES OF RECIPIENTS</b>	<p>Data controllers:</p> <ul style="list-style-type: none"> <li>• Companies, consultants, and freelancers, even associated companies, for the management of administrative and accounting procedures related to the employment relationship.</li> <li>• Companies, consultants, and freelancers, even associated companies, for the management of the Company's IT infrastructure and the provision of email services.</li> </ul> <p>Independent owners:</p> <ul style="list-style-type: none"> <li>• Public bodies (Territorial Labor Directorate, Revenue Agency), social security institutions (INPS, INAIL) in compliance with employer regulations.</li> <li>• Insurance institutions for corporate liability insurance and/or for payments into supplementary pension plans.</li> <li>• Business organizations to which the Company belongs.</li> </ul>
<b>DATA TRANSFER</b>	Data transfer is not expected
<b>CANCELLATION POLICY</b>	10 years from the termination of the employment relationship

<b>PROCESSING</b>	<b>WORK MANAGEMENT, PLANNING AND ORGANIZATION, ATTENDANCE RECORDING AND PAYMENT OF DUE AMOUNT</b>
	<p>Purpose: Management of the employment relationship</p> <p>Legal basis for processing common data: performance of a contract pursuant to Article 6, paragraph 1, letter b) of GDPR.</p>
	<p>Purpose: Application of legislation on social security and welfare, including supplementary social security, as well as tax and trade union matters.</p> <p>Legal basis for the processing of general data: fulfilment of legal obligations pursuant to Article 6, paragraph 1, letter c) of the GDPR. In particular, reference is made to employment, accounting, and tax legislation.</p> <p>Legal basis for the processing of special data: fulfilment of obligations and exercise of specific rights of the data controller or the data subject in the field of labour and social security law and social protection pursuant to Article 9, paragraph 1, letter b) of the GDPR. In particular, reference is made to legislation on:</p> <ul style="list-style-type: none"> <li>• health and safety in the workplace (Legislative Decree 81/2008)</li> <li>• right to work for persons with disabilities (Law 68/1999)</li> </ul>
	<p>Purpose: fulfilment of obligations arising from insurance contracts aimed at covering risks related to the employer's liability for occupational health and safety and occupational diseases.</p> <p>Legal basis for processing common data: fulfilment of legal obligations pursuant to Article 6, paragraph 1, letter c) of the GDPR. In particular, reference is made to employment law.</p> <p>Legal basis for processing of special data: fulfilment of obligations and exercise of specific rights of the data controller or the data subject in the field of labour and social security law and social protection pursuant to Article 9, paragraph 1, letter b) of the GDPR. Specifically, reference is made to the legislation regarding:</p> <ul style="list-style-type: none"> <li>• health and safety in the workplace (Legislative Decree 81/2008)</li> <li>• right to work for persons with disabilities (Law 68/1999)</li> </ul>
	<p>Purpose: payment of salaries, cheques, bonuses, other wages, donations, or fringe benefits</p> <p>Legal basis for processing of common data: Performance of a contract pursuant to Article 6, paragraph 1, letter b) of the GDPR</p>
<b>PURPOSE AND LEGAL BASIS</b>	<p>Purpose: accounting management</p> <p>Legal basis for processing of common data: fulfilment of legal obligations pursuant to Article 6, paragraph 1, letter c) of the GDPR. In particular, reference is made to the regulations governing accounting management and the preparation of financial statements.</p>
	<p>Natural persons working for the Company as employees or collaborators</p>
<b>CLASSES OF INTERESTED PEOPLE</b>	
<b>TYPES OF DATA</b>	<p>General data: name and personal data; residential address; email address; telephone number; any disadvantages that give access to legal benefits;</p>

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<b>PROCESSING</b>	<b>WORK MANAGEMENT, PLANNING AND ORGANIZATION, ATTENDANCE RECORDING AND PAYMENT OF DUE AMOUNT</b>
	<p>contractual status; working hours; duties performed; disciplinary measures.</p> <p>Special data (health related): any disabilities</p> <p>Special data (religious / philosophical / political): holiday or paid leave on religious holiday; union membership, paid leave to attend union meetings or to carry out political activities</p> <p>Special data (legal): possible garnishment of one-fifth of your salary</p>
<b>CATEGORIES OF RECIPIENTS</b>	<p>Data controllers:</p> <ul style="list-style-type: none"> <li>• Companies, consultants, and freelancers, even associated companies, for the management of administrative and accounting procedures related to the employment relationship.</li> <li>• Companies, consultants, and freelancers, even associated companies, for the management of the Company's IT infrastructure and the provision of email services.</li> </ul> <p>Independent owners:</p> <ul style="list-style-type: none"> <li>• Public bodies (Territorial Labor Directorate, Revenue Agency), social security institutions (INPS, INAIL) in compliance with employer regulations.</li> <li>• Insurance institutions for corporate liability insurance and/or for payments into supplementary pension plans.</li> <li>• Credit institutions for the payment of amount dues</li> <li>• Business organizations to which the Company belongs</li> <li>• Trade unions</li> <li>• Credit and financial institutions in the case of garnishment of one-fifth of your salary</li> <li>• Creditors in the case of third-party pledges</li> </ul>
<b>DATA TRANSFER</b>	Data transfer is not expected
	Purpose of managing the employment relationship: 10 years from registration
	Purpose of application of the legislation on social security and assistance, including supplementary assistance, as well as on tax and trade union matters: 10 years from the termination of the employment relationship
<b>CANCELLATION POLICY</b>	Purpose: fulfilment of obligations arising from insurance contracts aimed at covering risks connected to the employer's liability in matters of health and safety at work and occupational diseases: 10 years from the termination of the employment relationship
	Purpose of payment of salaries, cheques, bonuses, other compensations, donations or additional benefits: 10 years from registration
	Purpose: accounting management: 10 years from the closing of the financial statement to which the data recording refers

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PROCESSING	WORKPLACE HEALTH AND SAFETY MANAGEMENT
<b>PURPOSE AND LEGAL BASIS</b>	<p>Purpose: Compliance with legal obligations regarding occupational health and safety.</p> <p>Legal basis for the processing of general data: compliance with legal obligations pursuant to Article 6, paragraph 1, letter c), of the GDPR. In particular, reference is made to the legislation regarding: health and safety in the workplace (Legislative Decree 81/2008).</p> <p>Legal basis for the processing of sensitive data (healthcare): Occupational medicine purposes, assessment of the employee's working capacity pursuant to Article 9, paragraph 2, letter h), of the GDPR. In particular, reference is made to the legislation regarding:</p> <ul style="list-style-type: none"> <li>• right to work for persons with disabilities (Law 68/1999)</li> <li>• health and safety in the workplace (Legislative Decree 81/2008).</li> </ul>
<b>CLASSES OF INTERESTED PEOPLE</b>	Natural persons working for the Company as employees or collaborators
<b>TYPES OF DATA</b>	Special data (health): health status, qualified for the job, functional limitations, specific requirements (including PPE)
<b>CATEGORIES OF RECIPIENTS</b>	<p>Data controllers: Companies, consultants, and freelancers, even associated companies, for the management of the Company's IT infrastructure and the provision of email services.</p> <p>Independent owners:</p> <ul style="list-style-type: none"> <li>• Competent physician</li> <li>• Social security institutions (INPS, INAIL) and inspection services (SPRESAL) in compliance with the requirements for employers</li> </ul>
<b>DATA TRANSFER</b>	Data transfer is not expected
<b>CANCELLATION POLICY</b>	Archiving for 20 years after termination of the employment relationship (in order to be able to demonstrate the correctness of the company's operations in the event of an occupational disease)

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<b>PROCESSING</b>	<b>COVIS GROUP INTEGRATED STAFF MANAGEMENT</b>
<b>PURPOSE AND LEGAL BASIS</b>	<p>Purpose: management of staff data belonging to the different companies of Covis Group, for internal administrative purposes.</p> <p>Legal basis for the processing of shared data: legitimate interest of the data controller, pursuant to Article 6(1)(f) of the GDPR and 48.</p>
<b>CLASSES OF INTERESTED PEOPLE</b>	<p>Natural persons working at NR COVIS S.r.l. as employees or contractors</p> <p>Natural persons working at companies belonging to the Covis Group as employees or contractors</p>
<b>TYPES OF DATA</b>	<p>Common data: name and personal details; residential address; email address; telephone number; any disadvantages that give access to legal benefits; contractual classification; working hours; duties performed; disciplinary measures; identity document data; driving license data (only for those who use company vehicles).</p>
<b>CATEGORIES OF RECIPIENTS</b>	<p>Independent owners:</p> <ul style="list-style-type: none"> <li>• Covis S.r.l. PIVA 02390530240</li> <li>• Peresan Welding Solutions S.r.l. PIVA 02842320307</li> <li>• Dalmon Water Solutions S.r.l. PIVA 04319820249</li> </ul>
<b>DATA TRANSFER</b>	Data transfer is not expected
<b>CANCELLATION POLICY</b>	24 months from collection and processing

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PROCESSING	TRAINING ACTIVITY MANAGEMENT
PURPOSE AND LEGAL BASIS	<p>Purpose: Management of staff training activities</p> <p>Legal basis for data processing:            In the case of mandatory training: existence of legal obligations pursuant to Art. 6, paragraph 1, letter c) of the GDPR. In particular, reference is made to:</p> <ul style="list-style-type: none"> <li>• regulations on health and safety in the workplace</li> <li>• in the case of optional training: existence of a legitimate interest on the part of the data controller, pursuant to Article 6, paragraph 1, letter f) of the GDPR. The legitimate interest consists in increasing the quality of production processes.</li> </ul>
	<p>Purpose: requesting, managing, and reporting funding for staff training activities</p> <p>Legal basis for data processing: fulfilment of contractual obligations pursuant to Art. 6, paragraph 1, letter b) of the GDPR in relation to the contract signed with the organization funding the training activity.</p>
CLASSES OF INTERESTED PEOPLE	Natural persons working for the Company as employees or directors
TYPES OF DATA	<p>Purpose: Management of staff training activities</p> <p>Common data: name and personal details, residential address, email address, telephone number, working hours, training activities attended, attendance/absence data, training outcomes</p>
	<p>Purpose: requesting, managing, and reporting funding for staff training activities</p> <p>Common data: name and personal details, residential address, email address, telephone number, contractual category, working hours, training activities attended, attendance/absence data, training outcomes, compensation due and received</p>
CATEGORIES OF RECIPIENTS	<p>Data Controllers:</p> <ul style="list-style-type: none"> <li>• Training agencies used by the Company to train its staff</li> <li>• Companies, consultants, and freelancers, even associated companies, for the management of the Company's IT infrastructure and the provision of email services.</li> </ul> <p>Independent owners:            Bodies funding training activities            Social security institutions (INPS, INAIL) and inspection services (SPRESAL) in compliance with the requirements for employers</p> <p>Joint owners:            CFRLAB Consorzio di Consulenza, Formazione, Ricerca PIVA 01396620039            Via Ugo Sironi, 5, 28921 Verbania VB            segreteria@cfrlab.it            cfrvco@pec.it</p>
DATA TRANSFER	Data transfer is not expected
	Purpose of managing staff training activities:

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PROCESSING	TRAINING ACTIVITY MANAGEMENT
CANCELLATION POLICY	in the event of mandatory training: 10 years from the termination of employment; in the case of elective training: upon termination of employment.
	Purpose of request, management and reporting of contributions for training activities aimed at staff: 10 years from the end of the financial year in which the training activity was reported

**Joint ownership in data processing**

Pursuant to the Joint Data Controllorship Agreement for personal data, pursuant to Article 26 of the GDPR, signed on December 2nd, 2025, between NR COVIS S.R.L. and CFRLAB – Consorzio Consulenza Formazione Ricerca, we hereby inform you of the following:

Subject of joint ownership: data relating to the Company's staff and specifically

- a. personal data and contact information
- b. data related to company job level
- c. data related to qualifications
- d. data related to training activities participation

Purpose of processing:

- a. fulfilment of mandatory obligations under the regulations of any training funding body regarding the implementation and reporting of training activities funded by third parties.
- b. preparation and delivery of individual certificates of attendance for those who have achieved the training objectives of the course attended.
- c. archiving of documentation relating to the training project to make it available to the competent institutional bodies as part of their verification and control activities.
- d. demonstration to the joint controller and third parties of the formal and substantive correctness of the activities performed.

Treatments carried out by NR COVIS S.r.l.

Processing	Interested people	Processed data
Training activity management	NR COVIS S.r.l. employees participating in training courses	a) personal and contact information: name, date and place of birth, gender, tax code, citizenship, place of residence, company email address, company telephone number  b) data related to company job level: company affiliation, company area in which work is performed, date of hire, amounts paid as wages  c) data related to qualifications  d) data related to training activities participation

Treatments carried out by CFRLAB Consorzio di Consulenza, Formazione, Ricerca

Processing	Interested people	Processed data
Training activity management	NR COVIS S.r.l. employees participating in training courses	a) personal and contact information: name, date and place of birth, gender, tax code, citizenship, place of residence, company email address, company telephone number  b) data related to company job level: company

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Processing	Interested people	Processed data
		affiliation, company area in which work is performed, date of hire, amounts paid as wages  c) data related to qualifications  d) data related to training activities participation

Processing prohibitions: joint controllers are not permitted

- a. perform profiling activities
- b. data spread
- c. process data for purposes other than those provided for in the Agreement
- d. process data not provided for in the Agreement

Modalities to exercise your rights

To obtain a copy of the Joint Controllership Agreement or to exercise the rights referred to in point 6 of this information notice, you can contact any of the joint controllers at the following addresses:

NR COVIS S.r.l.  
e-mail [hr@covisgroup.it](mailto:hr@covisgroup.it)  
pec [nrcovis@legalmail.it](mailto:nrcovis@legalmail.it)

CFRLAB Consorzio di Consulenza, Formazione  
segreteria@cfrlab.it  
cfrvco@pec.it