



## PRIVACY INFORMATION NOTICE FOR CANDIDATES

With this Privacy information notice for candidates of Loro Piana (hereinafter, the "**Privacy Notice**"), **Loro Piana S.p.A.** (hereinafter, "**Loro Piana**," the "**Company**" or the "**Data Controller**") provides information about the modalities and purposes of the processing of personal data relating to candidates to a job posting at Loro Piana or another group company that is carried out in the context of the recruiting process, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, the "**GDPR**").

In particular, the processing of personal data relating candidates who send their *curriculum vitae* to the Company or otherwise participate in recruiting process aimed at establishing an employment or collaboration agreement with the Company (hereinafter, the "**Personal Data**") is carried out in accordance with the applicable data protection legislation, including the GDPR and any relevant laws or regulations adopted locally in the countries in which Loro Piana operates, also through its affiliates, included the Italian Legislative Decree no. 196/2003, as lastly amended and updated by the Italian Legislative Decree no. 101/2018 (the "**Privacy Code**").

### 1. WHO IS THE DATA CONTROLLER?

**Loro Piana**, in its capacity as employer, is the **data controller** of the personal data of candidates applying to a job posting at the Company that are collected in the context of the recruitment process.



**Registered Office:** Corso Rolandi 10, Quarona (VC)

**Email address:**

[privacy@loropiana.com](mailto:privacy@loropiana.com)



The Company has appointed a **Data Protection Officer (DPO)** who can be reached at [privacy@loropiana.com](mailto:privacy@loropiana.com)

### 2. TO WHOM IS THIS PRIVACY NOTICE ADDRESSED?

This Privacy Notice is addressed to candidates for a job position at Loro Piana who voluntarily send their *curriculum vitae* to the Company, apply for a job position at Loro Piana or otherwise participate in selection procedures aimed at establishing a working relationship or collaboration with the Company (hereinafter, individually referred to as the "**Candidate**" or "**Data Subject**" or collectively referred to as the "**Candidates**" or "**Data Subjects**").

### 3. WHAT PERSONAL DATA ARE PROCESSED?

During the selection process and during the possible establishment of the employment or collaboration relationship, Loro Piana collects and processes the following Personal Data related to the Data Subjects within the limits provided by law.

## COMMON DATA

- **Identifying data**, such as first name, last name, date and place of birth, gender, social security number, and identity documents.
- **Contact information**, such as residential address, personal telephone number and e-mail address.
- **Educational and professional background data**, including *curriculum vitae*, training completed, past work experience, development plans, and professional and personal skills obtained.
- **Salary and financial data**, including current salary.
- **Work activity data**, including job title, role and level held.
- **Family status data**, including information on marital status and any family members with whom Loro Piana has an existing employment or collaboration relationship.
- **Data on VISA and its validity**, in the case of foreign applicants.
- **Images and voice collected during any video interviews**, also conducted through any virtual assistant or recruiting system.
- **Any other information gathered during the selection process** (e.g. during interviews, including virtual ones, or through tests or questionnaires filled in by Candidates).

## SPECIAL CATEGORIES OF PERSONAL DATA

- **Data relating to the state of health and the fitness to work**, such as possible affiliation to sheltered groups.



Loro Piana processes any special categories of personal data only if it is necessary to fulfill its obligations and exercise its rights in the field of labor law and social security and protection, and in any case within the limits of the provisions of Article 9 of the GDPR. Otherwise, such information will be processed exclusively in an anonymous manner.

## 4. FOR WHAT PURPOSES IS PERSONAL DATA PROCESSED?

Loro Piana processes Personal Data for the following purposes:



### ASSESSMENT PURPOSES

- Completion of the selection and recruitment process for Loro Piana staff or collaborators, including assessment of the Candidate's professional profile for the purpose of establishing an employment or collaboration relationship with Loro Piana.
- If the selection process is successful, stipulation of the employment or collaboration agreement with the Company and adoption of the necessary pre-contractual measures.
- Management of administrative-accounting obligations in the preparatory phase of the possible stipulation of the employment or collaboration contract with Loro Piana.

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Such processing is carried out pursuant to **Article 6(1)(b) of the GDPR** to conduct the selection and recruiting process and fairly assess the Candidate's suitability for a specific position, role or task, as well as to establish the possible employment or collaboration relationship with Loro Piana. The processing of Personal Data for these purposes is **mandatory** and any refusal to provide Personal Data determines the impossibility for Loro Piana to evaluate the professional suitability of the Candidate and, therefore, the correct execution of the selection process.



## LVMH GROUP SHARING PURPOSES

Upon Candidate's consent, communication of Personal Data to the LVMH group in order to share the Candidate's profile with the other *maisons* of the group worldwide and to be contacted in the event of a search or job opening in line with the Candidate's professional profile.

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Such processing is carried out pursuant to **Article 6(1)(b) of the GDPR** to allow Loro Piana to share the Candidate's profile with the other *maisons* of the LVMH group. The processing of Personal Data for these purposes is optional, but failure to give consent will not allow Loro Piana to communicate the Candidate's professional profile to the LVMH group and to be eventually contacted by the other *maisons* of the group for possible job positions, roles or tasks in line with the Candidate's professional profile.



## LAW PURPOSES

- Fulfilment of specific obligations provided for by the EU and national legislation or by national or company collective agreements regarding social security and assistance, including supplementary assistance, hygiene and safety at work or in the population, protection of health, public order and safety, as well as tax and fiscal matters, to which Loro Piana is subject for the purposes of the establishment of the employment relationship.
- Handling and resolution of **reports of misconduct and violations occurring within the corporate organization and communicated by Data Subjects through Loro Piana's internal whistleblowing channel**, including the verification of the facts that are the subject of the report, the preparation of the relevant feedback and the adoption of any relief or support measures for whistleblowers, in accordance with the obligations provided for by local *whistleblowing* regulations.

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Such processing is carried out pursuant to **Article 6(1)(c) of the GDPR** in order to enable Loro Piana to fulfill and comply with legal obligations to which it is subject as employer. The processing of Personal Data for these purposes is therefore **necessary** to enable Loro Piana to comply with the applicable legislation. Any refusal to provide Personal Data will therefore make it impossible to continue the selection process as well as to eventually establish an employment or collaboration relationship with Loro Piana.



## LEGITIMATE INTEREST PURPOSES

- Exercise and defense of a right of Loro Piana or of a third party in judicial proceedings, as well as in administrative proceedings or in arbitration and conciliation procedures in the cases provided for by laws, including EU or national legislation, or national or company collective agreements.

- Performance of activities that are functional to transfers of assets, branch of business, acquisitions, mergers, divisions or other transformations involving Loro Piana or the LVMH Group in general and the execution of such operations
- Handling of any **reports concerning unlawful conducts or violations occurring within the Loro Piana organization communicated through the whistleblowing channels made available by the LVMH Group. With specific reference to the processing of Personal Data carried out for whistleblowing purposes through the LVMH Group's channel, please refer to the relevant Privacy Information Notice that is available on the Whispli Portal (<https://lvmh.whispli.com/group-alert-line?locale=it>).**

Processing for such purposes is carried out pursuant to **Article 6(f) of the GDPR** for the fulfillment of Loro Piana's legitimate interest to exercise its rights, including the defense in court, the prevention and repression of any unlawful or fraudulent conduct to the detriment of the Company and its group entities, as well as the performance of the economic operations indicated above, which is fairly balanced against the legitimate interest of the Data Subject. Processing for such purposes **is not mandatory** and the Data Subject may object to such processing in the manner set forth in this Privacy Notice, but should the Data Subject object to such processing his or her Personal Data may not be used, except where Loro Piana demonstrates the presence of overriding compelling legitimate grounds for the processing or where the processing is necessary for the exercise or defense of a right, pursuant to Article 21 of the GDPR.

## 5. HOW IS PERSONAL DATA PROCESSED?

Personal Data is processed using both IT and automated tools, including the systems provided for in Article 4 of Legislative Decree No. 104 of 27 June 2022 (the so-called "**Transparency Decree**"), and on paper and, in any event, by means of instruments suitable to guarantee security and confidentiality.



For further information on the automated systems used by Loro Piana for personnel selection and Candidate assessment, please refer to [Annex 1](#) to this Privacy Notice. **In no case, automated decisions are taken, i.e. human intervention is always guaranteed.**

## 6. TO WHOM IS PERSONAL DATA COMMUNICATED?

As part of the Company's organizational structure, Personal Data is processed by Loro Piana personnel specifically authorized and designated for this purpose, as persons in charge of the processing and/or Privacy Stewards.

In addition, the following third parties process the Personal Data, acting as data processors or independent data controllers depending on the service provided:



### DATA PROCESSORS

- **Services desk and reception providers** that access to the names and business contact information of customers, suppliers and visitors



### INDEPENDENT DATA CONTROLLERS

- **Freelancers, law firms, and consulting firms** operating under a professional secrecy obligation that process Personal Data in the performance of specific assistance services (e.g., performing activities aimed at

- **Surveillance providers** that process data on access to the Company's offices and facilities, as well as CCTV footages collected at Loro Piana's premises
- **Other providers with which procurement and service contracts are in place** that entail the processing of Personal Data of Loro Piana's personnel



For the full list of designated data processors, please contact Loro Piana by emailing at [privacy@loropiana.com](mailto:privacy@loropiana.com)

ascertaining, exercising, or defending a right in litigation/pre-litigation)

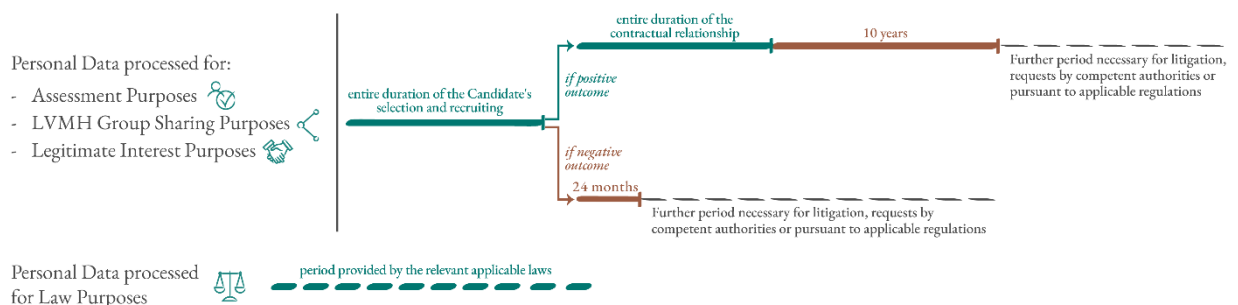
- **Administrative or judicial authorities, as well as agencies and institutions** for the fulfillment of obligations under national and EU laws and regulations, as well as any applicable labour collective agreement
- **Providers of automated e-mail delivery services** for sending communications, documents, or materials
- **Control and supervisory bodies**
- **Subsidiaries/controlling or affiliated companies**, entities that are **transferees of a company** or business unit, **companies resulting from mergers, demergers or other corporate reorganizations**
- **Other Loro Piana or LVMH group companies** if the application is positively evaluated for other positions within the Loro Piana group or if the Candidate agrees to apply for roles or tasks in other *maisons* of the LVMH group

## 7. IS PERSONAL DATA TRANSFERRED ABROAD?

**Personal Data is not transferred to countries outside the European Economic Area.**

In any case, where Loro Piana needs to transfer Personal Data to countries outside the European Economic Area, it adopts **appropriate safeguards** in order to ensure an adequate level of protection for Personal Data. In particular, where no Adequacy Decision for such foreign country has been issued by the European Commission, Loro Piana adopts the Standard Contractual Clauses in compliance with Articles 45 and 46 of the GDPR.

## 8. HOW LONG IS PERSONAL DATA RETAINED?



**Personal Data is retained for as long as it is strictly necessary to fulfill the purposes above.**

Specifically, Personal Data processed for the **Assessment Purposes**, the **LVMH Group Sharing Purposes**, and the **Legitimate Interest Purposes** are retained for the **entire duration of the Candidate's selection and recruiting** and:

- **in the event of a positive outcome of the selection process**, i.e. if the Candidate is selected and establishes an employment relationship with Loro Piana, **for the entire duration of the contractual relationship**, as well as **for 10 years following its termination**; or

- **in the event of a negative outcome of the selection process**, i.e. where the Candidate is not selected for any job position at Loro Piana, **for 24 months from the end of the selection process for a specific job position**.

This retention period applies except in cases where retention for a further period is necessary for any litigation, requests by the competent authorities, or pursuant to applicable regulations.

For the **Law Purposes**, instead, Personal Data are processed for **the period provided by the relevant applicable laws**.

At the end of the above-mentioned retention period, Personal Data will be deleted, anonymized, or aggregated.

## 9. WHAT ARE THE PRIVACY RIGHTS OF THE DATA SUBJECT?

Pursuant to Articles 15-21 of the GDPR, the Data Subject may – at any time and free of charge and in any case within the limits of the applicable legislation – exercise the following rights:



**Obtain confirmation** of the existence or non-existence of his/her Personal Data and, in case, **access** to such Personal Data.



**Know the source** of the Personal Data, the purposes and modalities of processing, and the logic applied to any processing carried out by automated decision-making processes.



**Verify the accuracy** of the Personal Data and **request the update, rectification, modification** or – if he/she has an interest – the **integration** of his/her Personal Data.



**Request the deletion** of his/her Personal Data without undue delay.



**Withdraw his/her consent** where previously given.



**Request the restriction of the processing** of his/her Personal Data.

This can occur if:

- the Data Subject disputes the accuracy of the Personal Data, for the period necessary for the Data Controller to verify the accuracy of such Personal Data;
- the processing is unlawful and the Data Subject objects to the deletion of the Personal Data and requests its use to be restricted;
- Personal Data is necessary for the Data Subject to establish, exercise or defend a right in a court, although the Data Controller no longer needs it for the purpose of processing; or
- the Data Subject has objected to the processing pursuant to Article 21 of the GDPR, pending verification as to whether Loro Piana's legitimate interest prevail over the rights and freedoms of the Data Subject.



**Object to the processing of Personal Data for purposes based on Loro Piana's legitimate interest**, except where Loro Piana has overriding legitimate reasons or its needs to assert or defend a right in any legal proceedings.



**Obtain an electronic copy of his/her Personal Data**, when the Data Subject wishes to receive his/her Personal Data or to transmit it to a different data controller, in cases where Loro Piana processes Personal Data on the basis of a contract, his/her consent, or the Personal Data is processed by automated means.

Without prejudice to the foregoing, the rights listed above may be subject to limitations if the exercise of such rights may result in an actual and concrete prejudice to the confidentiality of the identity of the person who reports a so-called whistleblowing violation of which he/she has become aware by virtue of his/her relationship with Loro Piana or functions performed for the latter.

In the event of death of the Data Subject, the aforementioned rights may be exercised by his or her successors with an interest or acting as his or her representative, or for family reasons worthy of protection. The Data Subject may expressly prohibit the exercise of some of the rights listed above by its successors by submitting a written request to Loro Piana at the e-mail address below. This declaration may be subsequently withdrawn or modified through the same modalities.



Data Subjects' rights requests can be sent by e-mail to Loro Piana at [privacy@loropiana.com](mailto:privacy@loropiana.com).



The Data Subject may also exercise the right to file a complaint with the *Garante per la protezione dei dati personali*, by using the contact details below, as indicated at <https://www.garanteprivacy.it>

Piazza Venezia n. 11 - 00187 Rome

**Centralino telefonico:** (+39) 06.696771      **Fax:** (+39) 06.69677.3785

**Indirizzo e-mail:** [protocollo@gpdp.it](mailto:protocollo@gpdp.it)

## 10. CHANGES AND UPDATES

This Privacy Notice is valid as of the effective date below.

Information regarding the processing of Personal Data and included in this Privacy Notice may be subject to revision as a result of:



- Significant changes in the applicable data protection legislation;
- Technological implementations that impact the modalities in which Personal Data is currently processed;
- Organizational changes in the structure of Loro Piana or the LVMH Group of which the Company is a part that may affect the processing of Personal Data.



In the event of revision or updating of this Privacy Notice, Loro Piana will inform Candidates about the new modalities of the processing, by sending a notification to the email address of Candidates so that they can read it.

Quarona, 2024, November 8th




**Loro Piana S.p.A.**

## ANNEX 1

### Automated decision-making or monitoring systems used by Loro Piana and falling within the scope of the Transparency Decree

Below is a description of the automated systems used by Loro Piana for personnel selection and which fall within the scope of application of Article 4 of the Transparency Decree.

<b>System Name</b>	<b>Algo Interview</b>
<b>Purpose</b>	<b>Assessment of Candidates' skills</b>

	<p><b>The aspects of the employment relationship that are affected by the use of the system</b></p>	<p>The system provides relevant information and/or incidents on:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> recruitment or assignment of tasks to workers</li> <li><input type="checkbox"/> management or termination of employment relationship</li> <li><input type="checkbox"/> assignment of tasks or duties</li> <li><input type="checkbox"/> surveillance, monitoring or assessment of the worker performance</li> <li><input type="checkbox"/> the performance of contractual obligations</li> </ul>
	<p><b>Scope and purpose of the system</b></p>	<p>Algo Interview is an AI system aimed at analyzing candidates' competencies through a virtual recruiting system. It facilitates the Loro Piana HR Team to assess candidates' skills, which are gathered and analyzed during video interviews operated through the system itself.</p> <p>Specifically, Algo Interview poses a series of questions to candidates, also through video interviews, which the AI analyzes to assess their skills. For the assessment, Algo Interview employs a type of neural network that processes candidates' responses, assigning a ranking to determine the level of confidence (on a scale of 1 to 5) for each candidate in a specific area.</p> <p>The skills analyzed by Algo Interview include problem solving, cognitive flexibility, critical thinking, goal orientation, teamwork, leadership and negotiation ability, social intelligence, organization and planning skills, and learning orientation.</p> <p>Based on the aforementioned skills, Algo Interview generates a report that is reviewed by the Loro Piana HR team to assess the candidates' suitability and attitude for a specific role or task. In any case, this process is always overseen by human personnel. In particular, the recruiting process is carried out by Loro Piana's HR staff who is the only one deemed to assess the candidate.</p>
	<p><b>The logic and functioning of the system</b></p>	<p>Algo Interview consists of a set of functional, machine-learning-assisted and deep-learning algorithms, as follows.</p> <ul style="list-style-type: none"> <li>• <b>UNDERLYING MODELS:</b> The audio is filtered and transcribed using OpenAI Whisper, a pre-trained model for speech recognition (ASR).</li> </ul>



Furthermore, a context analysis based on a Corpora and a proprietary algorithm provides a response on the context of the candidate's response, adding a score regarding soft-skill.

- **ALGO INTERVIEW AI**: It is a combination of deterministic algorithms and a machine learning-based neural network. Specifically, the AI analyzes key concepts of Candidates' responses, by comparing their response with a set of similar positive responses from expert writing and interview endorsements in human training. Algo Interview AI is trained from a data matrix precomputed that is recomputed with human intervention after each interview. In fact, Algojob refines its AI models using anonymized answers, through a learning mechanism supervised by Algojob's team of data scientists, in order to continuously improve the reliability of the evaluations processed by the system.



#### The main data categories and parameters used to programme or train the system

Data collected through Algo Interview include Candidates' image and voice as well as the information included in their responses. Such data are processed by Loro Piana for managing Candidates' job application and carrying out the recruitment process, in accordance with [Loro Piana Privacy Information Notice for Candidates](#) above.

Candidates' data will also be processed by the provider of the system, Algojobs S.r.l. for purposes of AI training and consequent improvement of the AI results, as well as for research and development purposes. More information on the processing of personal data carried by Algojobs S.r.l. can be found in the Algojobs privacy notice provided to Candidates during the selection process and in any case available on the Algo Interview platform.



#### The control measures taken for automated decisions

Control measures consist of the adoption of a series of organisational and technical measures with the aim of limiting the risks that may arise through the use of the systems, such as the risk of bias or hallucinations.

In particular, Loro Piana, also through the provider of the system, has implemented the following measures:

- detailed policies and procedures with which employees are obliged to comply and which are aimed at guaranteeing conduct that ensures compliance with the principles of confidentiality, availability and integrity of data
- a Data Protection Impact Assessment (DPIA) for the analysis and evaluation of processing operations that, in view of the nature, subject, context and purposes of the processing, present a high risk for the rights and freedoms of natural persons;
- technical measures to ensure compliance with the principles of purpose limitation, data minimisation, accuracy, storage limitation, confidentiality, integrity and availability (e.g. encryption, *strong authentication* methods, appropriate data erasure methods, etc.); and

Furthermore, the results produced by Algo Interview are always subject to human supervision and editing, including by Loro Piana. In particular, Loro Piana entrusts employees who have the appropriate competence, training and

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authority, as well as the necessary support to ensure the proper conduct of the recruitment process.

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**The level of accuracy, robustness and cybersecurity of these systems, the metrics used to measure them, and the potentially discriminatory impacts of these metrics**

Data obtained through Algo Interview is accurate. However, while Algo Interview is generally reliable, it is not infallible. In certain circumstances, it may produce incorrect or inconsistent information.

The following biases or hallucinations may be observed:

- Linguistic bias in favour of content in neo-Latin languages and Western perspectives; or
- Hallucinations due to the use of terms not related to the context of a specific question answered by the Candidate or resulting from the transcription of answers given in poor quality audio.

To address these issues, as illustrated above, Loro Piana, through the provider of the system, has implemented the following measures to ensure the reliability of the AI-powered system:

- Use of heterogeneous datasets in terms of, for example, country of origin, gender, age and socio-economic status; and
- Adoption of algorithms that perform an analysis on the concatenation of words and not on individual words in order to capture the semantic meaning of the concept even if random terms are used or the audio is not of good quality.

Furthermore, no automated decisions that affect the recruitment process are made, and human intervention is always guaranteed. Indeed, the Loro Piana HR team is always involved in the assessment of candidates' suitability and attitude for a specific role or task.