

**Privacy**  
**pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")**  
**Last Updated: 22 April 2026**

Dear Candidate,

below are the methods for processing the personal data provided by sending the *curriculum vitae*, both in the case of a response to an advertisement and in the case of a spontaneous application ("CV").

This Statement went into effect on the "*Last Updated*" date noted near the top of this page. We may update this statement from time to time. When we do, we will notify you of any modifications to this Statement that might materially affect your rights or the way that we use or disclose your personal information prior to the change becoming effective.

The Company may also receive CVs from personnel search agencies to which specific assignments have been assigned; by internal Company personnel according to specific procedures adopted; through channels (QRCode) made available directly at the Roastery and through the website, "Work with us" section and external recruitment channels (e.g. LinkedIn, Indeed, ...).

**1. DATA CONTROLLER AND PERSONNEL DATA PROTECTION OFFICER ("DPO"):**

Starbucks Italy S.r.l. with registered office at Passaggio Centrale 2, angolo via Orefici 13, 20123 Milan ("**Data Controller**" or "**Company**").

The Data Protection Officer or DPO can be reached at the e-mail address [privacy@starbucks.com](mailto:privacy@starbucks.com) .

**2. TYPE OF DATA PROCESSED**

To examine your application, the Data Controller will have to process certain personal data, such as, for example:

- name and surname;
- contact details (e.g. email address, telephone number, residential address);
- level of education;
- any belonging to protected categories to evaluate the application for job positions falling within the scope of the targeted placement. Such information may be processed only in the presence of the appropriate legal basis indicated by art. 9 (2) (b) GDPR. In the absence of such cases as well as in the absence of the conditions referred to in art. 9 of the GDPR, such data will not be taken into account and will be immediately deleted;
- any additional information included in the CV and/or available from publicly accessible sources as indicated below.

In certain circumstances such as, for example, training initiatives (*Recruiting Days*) organized at the Company's premises, your images (photos and videos, together "Images") may be collected subject to your authorization and collection, even at a later time.

It is requested to include in the CV only the data necessary to evaluate the profile and to refrain from indicating particular categories of data such as, for example, those relating to the state of health, religious beliefs or political opinions.

Generally, our services and recruitment activities are not intended for individuals under the age of 14. If a parent or guardian believes that we may have collected information relating to a minor, they are invited to contact us immediately as described in paragraph 9 of this Notice.

**3. SOURCE OF PERSONAL DATA**

The Company may also collect personal data for the evaluation of a possible recruitment with third party companies specialized in the search and selection of personnel on behalf of third parties or directly from publicly accessible sources (e.g. LinkedIn).

#### 4. PURPOSE, LEGAL BASIS AND NATURE OF THE PROVISION

	<b><i>Purpose of the processing</i></b>	<b><i>Legal basis</i></b>	<b><i>Nature of the provision</i></b>
A	<p><b>Profile assessment for recruitment purposes.</b> This purpose includes all activities connected or instrumental to the performance of the search and selection of candidates, including research and processing deriving from the use of professional social networks.</p>	<ul style="list-style-type: none"> <li>- Execution of pre-contractual measures at the request of the data subject (Art. 6.1 lit. (b) GDPR)</li> <li>- Legitimate interest in data collected from publicly accessible sources (e.g., professional social networks) (Art. 6.1 lit. (f) GDPR).</li> </ul>	<p>Obligatory. Failure to provide it may preclude the evaluation of the application.</p>
B	<p><b>Evaluation of applications as part of the targeted placement.</b> This purpose includes the processing of personal data and data belonging to special categories for the purpose of evaluating applications in the context of targeted placement.</p>	<ul style="list-style-type: none"> <li>- Execution of pre-contractual measures at the request of the data subject (Art. 6.1 lit. (b) GDPR).</li> <li>- Compliance with legal obligations (Art. 6.1 lit. (c) GDPR).</li> <li>- To fulfil the obligations and exercise the specific rights of the controller or the data subject in the field of labour and social security law and social protection (Art. 6.1 lit. (c) and Art. 9.2 lit. (b) GDPR).</li> </ul>	<p>Obligatory. Failure to provide it may preclude the effective evaluation of the application for the purposes of targeted placement.</p>
C	<p>Where applicable, ascertain, exercise or defend the rights of the Data Controller in an out-of-court and/or judicial setting.</p>	<ul style="list-style-type: none"> <li>- Legitimate interest (Art. 6.1 lit. (f) and Art. 9.2 lit. (f) GDPR).</li> </ul>	<p>Obligatory. Failure to provide such data may preclude the evaluation of the application and the exercise of the rights of the owner.</p>
D	<p>Participation in <b>training initiatives</b> (Recruiting Day) organized at the Company's premises on the occasion of which images of you (photos and videos) will be collected to be published on your social profiles (Instagram, Facebook, Starbucks stories) and/or on the Company's website.</p>	<ul style="list-style-type: none"> <li>- Consensus</li> </ul>	<p>Optional Failure to provide consent will make it impossible to collect and consequently use the Images.</p>

#### 5. RETENTION OF PERSONAL DATA

Your personal data will be stored for a maximum period of 12 months from the date of receipt of the CV, or from the date of the last update of the same communicated to us, without prejudice to your right to request its cancellation at any time.

The Images will be kept for a period that cannot exceed the time of withdrawal of consent, which can be requested at any time as described in the following paragraph 9.

In the event of processing of personal data for the exercise of a right in court, personal data will be stored for the entire duration of the litigation and until the deadline for appeals has been exhausted.

#### 6. RECIPIENTS OF PERSONAL DATA

Personal data may be communicated to the following subjects:

- those who can access the data by virtue of legal provisions provided for by European Union law or by that of the Member State to which the Data Controller is subject;
- subjects who carry out activities auxiliary to the purposes indicated in the appropriate paragraph and, specifically, recruiting companies, law firms, companies that offer IT infrastructures and IT assistance and consultancy services as well as the design and implementation of software and websites.

In addition, your personal data may also be disclosed to employees, designated as subjects who act, including with system administrator functions, under the authority of the Data Controller pursuant to art. 29 of the GDPR. In any case, personal data are not subject to dissemination.

#### **7. TRANSFERS TO THIRD COUNTRIES**

Personal Data may be transferred to countries of the European Union and to third countries within the scope of the purposes referred to in paragraph 1; adopting all the appropriate and appropriate conditions prescribed by the legislation. For further details on the transfer of personal data, you can write to the Data Controller using the contact details indicated in paragraph 9.

#### **8. DATA SECURITY**

Starbucks Italy processes personal data using appropriate technical, physical, and organizational security measures to ensure a level of security appropriate to the risk and to prevent loss, misuse, unauthorized access, disclosure, or alteration.

You remain responsible for adopting appropriate security measures to protect your devices and access credentials (e.g. username and password), and in particular for not sharing them with third parties.

#### **9. RIGHTS OF THE DATA SUBJECT**

As a data subject, you have the right to withdraw your consent at any time and to obtain access to your personal data from the Company. You may also request the Company to rectify or delete them. In addition, you have the right to obtain the restriction of the processing of personal data concerning you, as well as the right to portability of such data.

In addition to the above, you have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data carried out on the basis of Art. 6, paragraph 1, (f) as provided for in art. 21 of the GDPR. Starbucks Italy does not carry out automated decision-making processes. If this changes, this Notice will be updated accordingly.

To exercise each of your rights, you can contact the Data Controller by sending an email to [privacy@starbucks.com](mailto:privacy@starbucks.com).

Finally, you have the right to lodge a complaint to a supervisory authority (Italian Data Protection Authority – Garante per la protezione dei dati personali – [www.garanteprivacy.it](http://www.garanteprivacy.it)) or to take legal action if you believe that the processing of your personal data violates the GDPR.