

Subject matter: **Privacy Notice relating to the acquisition of candidate CVs and details (via web or other means) under art. 13 of Directive (EU) 2016/679 endorsed by the European Parliament and European Council dated 27 April 2016 on the protection of individuals with regard to the processing of personal data (in short respectively, the "Information Notice" and the "Regulation" or the "GDPR").**

In compliance with the obligations foreseen by the Regulation, we hereby inform you that **ITAL G.E.T.E. S.r.l.** will process the personal data you have or will provide to us in person or through other parties.

Processing of personal data shall take place in the following conditions.

**1. Identity and contact details of the Data Controller:**

**ITAL G.E.T.E. S.r.l.**, in the person of its legal representative pro-tempore, with registered office in Via C. M. Maggi 2, 20154 Milan (MI), Tax Code and VAT no. IT07606970155, e-mail: [info@italgete.it](mailto:info@italgete.it), PEC address: [italgete@cg.legalmail.it](mailto:italgete@cg.legalmail.it) (henceforth, "**ITAL G.E.T.E.**" or the "**Data Controller**")

**2. Purposes of the processing for which the personal data are intended as well as the legal basis for the processing:**

Your personal data shall be processed:

(i) without your consent (art. 6 letters b,c,f GDPR) for the following purposes:

- head-hunting, selection and recruitment of personnel for current or future positions, to be hired by the Data Controller's own organisation;
- upon successfully passing the selection phase, the forwarding of work contract proposals by the employer, according to the laws in force and in execution of any contractual agreements signed with yourself, ensuring timely fulfilment of all obligations of an operational, management and accounting nature;
- fulfilment of all obligations foreseen by Italian or foreign laws, by the National Collective Bargaining Agreement, or any other mandatory regulations (especially those envisaged for tax, welfare, social security, occupational health, hygiene and safety aspects along with public order and security.

(ii) with your consent (article 7, GDPR), for retention purposes of particular categories of data of any nature, pursuant to art. 9, GDPR, in addition to those classified as "protected categories", including your photograph submitted with your CV, which are not required during the selection procedure;

Collection of personal data for the purposes indicated in par. (i) above is mandatory. Non collection of data and/or express refusal to grant consent to the same will make it

impossible for the Data Controller to complete the selection process and fulfil its own obligations related to the initiation of any future work relationship.

Collection of personal data for the purposes referred to in par. (ii) is optional, whereby you are entitled to deny your consent, and also revoke such consent at any moment in time.

### **3. Categories of processed personal data**

In accordance with art. 4 (1) GDPR, "personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, acquired by the Data Controller in relation to the candidate.

In order to pursue and achieve the aforementioned processing purposes, in accordance with the principle of data minimisation foreseen by art.5, par. 1, letter (c), GDPR, the Data Controller does not need to process particular categories of data, as defined by arts. 9 and 10, GDPR, which refer to you (henceforth the "Data"), except for the sensitive data regarding whether or not the data subject belongs to the so-called "protected categories". We therefore advise you to refrain from sending further personal details, of whatever nature, to the Data Controller if the same are not required by the selection procedure; if you do send such data, the Data Controller shall be entitled to erase and/or obscure and, in any case, not process the same for any purpose envisaged by paragraph 2 above.

Please note that all processing of the data in question shall also be performed in accordance with the provisions of art. 8 of the Workers Statute (law 300/1970) whereby, for recruitment purposes and during the course of the work relationship, the Data Controller is not permitted to conduct any inquiries as to the political, religious or trade union related opinions of the worker, or any facts unrelated to the assessment of a worker's professional attitudes.

### **4. Personal data recipient categories**

For the purposes illustrated in paragraph 2, section (i) above, the personal data you provide may be made accessible:

- (i) to employees and collaborators of the Data Controller in their capacity as persons authorised to process such data: in particular, in respect of the activities related to Human Resource and administration management aspects, your personal data shall be processed by subjects expressly authorised by the Data Controller;
- (ii) to third-parties providing professional services to the Data Controller regarding the head-hunting, selection and recruitment of personnel and/or third party members of the personnel selection committees, in their capacities as Data Processors, appointed pursuant to the provisions in art. 28, GDPR.

(iii) to mandatory and optional social security and pension funds and bodies, trade union associations and representations designated by the Data Controller, and independent experts and professional firms appointed by the Data Controller to manage aspects related to salaries, wages and contributions, and/or the processing of the relative data to banking institutions and firms specialised in payment management, law and consulting firms, service providers of various nature;

(iv) to public authorities to fulfil legal and supervisory requirements, public administrations, public bodies and organisations (national and foreign).

The updated list of the Data Processors and designated processing officers shall be filed and retained at the Data Controller's premises.

## **5. Personal data processing operations**

Your personal data is processed using the methods indicated in art. 4 no. 2) of the GDPR - with or without the use of automated processes and refer to, more specifically: collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval and analysis, consultation, use, disclosure by transmission, any other form of dissemination, comparison, interconnection, restriction, erasure or destruction of personal data.

Personal data shall be processed using traditional (forms, records etc.) and electronic methods. In any case, the logical and physical security and, more generally, the confidentiality of the same shall always be guaranteed.

## **6. Transfer of personal data abroad**

The management and storage of personal data takes place on servers located in Italy at the Company's registered office and on servers inside the European Union owned and/or made available to the Data Controller, or third-parties duly appointed and nominated as Data Processors. Such data are not transferred outside Europe, unless specific transactions require the same.

Your personal data will not be subject to dissemination.

## **7. Personal Data retentions periods**

Your personal data shall be retained for a maximum of one year from the date we receive your CV, or from the date of the most recent update you send us.

## **8. Rights of the data subject**

Pursuant to the provisions of Chapter III Section I of the GDPR, in your capacity as Data Subject, you are entitled to exercise the rights indicated therein, and in particular:

- (i) to access your personal data;
- (ii) to obtain rectification or erasure of your personal data or restrictions on the

processing of the same; if erasure of data is requested, the Data Subject also has the right to oblige the Data Controller - taking account of available technology and the cost of implementation - to take reasonable steps, including technical measures, to inform the data processors in charge of the processing of the personal data, that the data subject has requested the erasure of any links to, or copy or replication of his or her personal data;

- (iii) to object to the processing of the same;
- (iv) to request data portability;
- (v) to withdraw your consent, as and where foreseen, at any moment in time, as long as it shall not affect the lawfulness of the processing based on the conferred consent before the withdrawal;
- (vi) to lodge a complaint with the supervisory authority.

The Data Subject may send a request to exercise such rights by email addressed to: [info@italgete.it](mailto:info@italgete.it)

### **Granting consent (pursuant to art. 7 GDPR)**

The undersigned Data Subject,

declares to have read the content of the Information Notice provided by the Data Controller pursuant to art. 7 GDPR, and to have received a copy of the same; the Data Subject also declares, in reference to:

1. To the retention purposes of particular categories of data of any nature, pursuant to art. 9, GDPR, in addition to those classified as "protected categories", including your photograph submitted with your CV, which are not required during the selection procedure (par. 2(ii) of the Information Notice)

I grant my consent

I do not grant my consent

The Data Subject

\_\_\_\_\_

Date \_\_\_\_\_