

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

CPC S.r.l. with registered office in Via del Tirassegno, 55 - 41122 Modena (MO), VAT number 00157040361 (hereinafter, "Owner"), as Data Controller, informs you pursuant to Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 (hereinafter, "Privacy Code") and art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR") that your data will be processed according to principles of correctness, lawfulness, transparency, in compliance with the purposes and methods indicated below, collecting them to the extent necessary and exact for the treatment.

### **1. Purpose of the Processing**

The Data Controller collects, records, consults and in general processes your data contained in the CV (personal data, previous work experience, educational qualification, family situation, passport photo) for purposes related to the selection process.

In particular, the Data Controller may use your data to:

- a) pre-contractual activities relating to the interest you declared to us in becoming part of our employees and therefore pertaining to the personnel search and selection process,
- b) pursue our legitimate interest for the purpose of ascertaining, exercising or defending our right in court.

### **2. Type of personal data processed**

The personal data that the Company usually uses include, but are not limited to:

- name, address, contact information, social security number, age, place and date of birth, educational qualification, previous work experience and qualifications (education, training courses and internships),
- documents proving your identity and your right to work and any other data reported on your CV;
- if the application was made through our website/Portal using your LinkedIn account or any other social media: your profile data;
- feedback about you from our staff and others;
- We may also collect data relating to your visits to our website including (eg your IP address, browser, timestamp, location, national traffic data, location data).

In some cases we may also collect, if strictly necessary for the purposes of the selection:

- your particular data pursuant to art. 9 of the GDPR suitable for revealing your state of health (for example belonging to protected categories pursuant to law 68/99, any disability and accommodation you need in the workplace).

Please do not include in your C.V. other particular data (religious, philosophical beliefs, political opinions, membership of political parties, trade unions, sexual orientation) which would in any case be cancelled.

### **3. Legal Basis**

The processing of data for the purposes referred to in point 1 a) is necessary for carrying out the selection process and in general, for the execution of the pre-contractual measures relating to the management of your professional relationship with us, pursuant to art. 6, par. 1, lit. b) of the GDPR.

The processing of data for the purposes referred to in point 1 b) is necessary to pursue our legitimate interest pursuant to art. 6, par. 1, lit. f) of the GDPR.

As regards the particular data suitable for revealing the state of health and strictly necessary for the purposes of the selection, as indicated above, they may be processed without your prior consent as the processing is necessary to fulfill the obligations or perform specific tasks envisaged by the legislation of the European Union, by laws, regulations or collective agreements, including corporate agreements, as well as to exercise the specific rights of the Data Controller or of the interested party, in the field of labor law and social security and social protection, pursuant to art. 9, par. 2,

lit. b) GDPR. We also refer to the provisions of the General Authorization 1/2016 of the Guarantor for the protection of personal data, as compatible with the GDPR.

#### 4. Method of collection

Your data is collected in the following ways:

- by email;
- by postal mail
- at our headquarters;
- through our website/portal
- through third party websites or social networks.

Further personal data may subsequently be collected from the interested party during the interview in a special evaluation form which will be kept together with the curricula with the same storage times.

Your data may therefore be collected:

- when the CV is received in response to a personnel search and selection announcement published by the Data Controller. In this case, only candidates meeting the requirements for an evaluation interview will be evaluated.
- when the C.V. it is sent following your spontaneous application: in the event that the application is not of interest to the Data Controller, the C.V. submitted will be destroyed immediately. On the contrary, if it were of interest to the Data Controller, the office in charge of evaluating the applications will provide appropriate information at the first useful contact with the interested party.

Once your application has been received, whether it is spontaneous or in response to an advertisement, your personal data may be entered, by personnel authorized for this purpose, in the Data Controller's archives, both in paper and electronic format.

#### 5. Storage period

The Data Controller has the right to keep your personal data for a period of up to 24 months from your application if of interest to us, or from the last activity with which you showed interest in us (for example, registration, access, updating the CV on the webform). If the selection process is successful, the Company will be required to keep your personal data for longer in order to comply with the contractual and legal obligations in force.

#### 6. Compulsory provision of data and consent

The provision of data is optional and is left to the will of the candidate to present his curriculum vitae. With regard to the data subsequently and possibly requested by the Data Controller, failure to provide it will make it impossible to proceed with the verification of the conditions for the hiring and/or for the start of the collaboration and therefore to the possible establishment of the employment relationship with the Holder.

#### 7. Processing methods

The processing of personal data collected with the methods described above will be carried out with both manual and electronic methods and will be based on the guarantee of maximum security in order to protect the rights and freedoms of the interested party. In particular, treatments consisting of automated decision-making processes on the data processed will not be carried out.

#### 8. Communication and dissemination of personal data

The Data Controller - without requiring your consent - can communicate your personal data to various categories of recipients, such as:

- the authorized data processors involved in the evaluation and selection of candidates.
- subjects (as an indication, companies/natural persons who carry out personnel research and selection activities on behalf of the Data Controller, companies/natural persons used by the Data Controller for the execution of services instrumental to the achievement of the aforementioned purposes, companies/ natural persons whom the Data Controller makes use of for the execution of data archiving activities). These subjects may carry out these activities as independent data controllers, external data processors or joint data controllers.

The Data Controller may also communicate your data for the aforementioned purposes:

- to supervisory bodies, judicial authorities, police bodies, public bodies and all those subjects to whom the communication is mandatory by law for the accomplishment of the aforementioned purposes. These subjects will process the data in their capacity as independent data controllers.

The data collected is not subject to dissemination.

## 9. Data transfer abroad

Personal data is not stored on servers located outside the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller ensures from now on that the transfer of data outside the EU will take place in compliance with the guarantees provided by the GDPR including adequacy decisions of the European Commission or contractual agreements for the protection of personal data (so-called "EU Standard Contractual clauses").

## 10. Your rights and how to exercise them

We inform you that, at any time and if the conditions are met, you can exercise your rights under the articles. 15 and subsequent GDPR:

- obtain confirmation of the existence or otherwise of personal data concerning you and their copy in an intelligible form;
- obtain the updating, rectification or integration of your data;
- request the deletion of your data, within the terms permitted by law;
- object, in whole or in part, to the processing of your personal data;
- limit the treatment, in case of violation, request for rectification or opposition;
- request the portability of data processed electronically, provided on the basis of consent or contract;
- revoke consent to the processing of your data, if required.
- in relation to fully automated profiling obtain the human intervention of the Data Controller to express his opinion and contest his decision.

If he deems it appropriate, he can lodge a complaint with the Guarantor Authority for the Protection of Personal Data.

To exercise your rights, you can contact the Data Controller at the following e-mail address: [privacy@cpcgroup.it](mailto:privacy@cpcgroup.it)