## PRIVACY POLICY STATEMENT

# (Pursuant to the "Code for the Protection of Personal Data" EU 2016/679 Regulation)



This information is provided pursuant to Article 13 of the Code for the Protection of Personal Data, EU 2016/679 Regulation.

The data processed will be that of Employees and Collaborators, including but not limited to, name, surname, place and date of birth, tax code, residence, gender, telephone contacts, educational qualifications, work experiences, and any additional data you may have included in your CV.

The Data Controller may process "special categories of data" under Art. 9 of the GDPR, such as data capable of revealing health status, belonging to protected categories, potentially contained in the CV.



#### CONTROLLER

Under the law on the protection of personal data,

M.Seventy Srl

Via Medici 13 - 20123 Milano

C.F. e P.Iva 02579501202

<u>mseventy@pec.it</u>as Controller of the processing of your personal data is required to provide you with information about the use of your personal data.



# **DPO (DATA PROTECTION OFFICER)**

The Controller has nominated as the Data Protection Officer, pursuant to Art. 37 of the European regulation on the Protection of Personal Data, EU 2016/679, and in particular as foreseen by paragraph 6, Schmidt Consulting Privacy Srl – Benefit Company, with registered office in Via Bagutta 13, 20121 Milano, who can be contacted via email at <a href="mailto:dpo@schmidtconsulting.it">dpo@schmidtconsulting.it</a>



### **NATURE OF DATA PROVISION**

The provision of data is mandatory for the activities of research and selection of personnel. The refusal to provide data will prevent the Data Controller from carrying out such activities and will not allow your application to be considered. The provision of data to acquire and/or verify information related to your previous professional references is optional.



### PURPOSES OF PROCESSING OF PERSONAL DATA AND LEGAL BASIS

Personal data is processed for the following purposes:

a) For purposes related to or instrumental to the conduct of research and selection activities of candidates in relation to all positions managed by the Data Controller.
b) Any personal data provided by you that falls under the special categories of data as per Art. 9 GDPR will be processed, only when necessary and relevant, to evaluate your application for employment positions within the scope of targeted placement.



- c) We may process public information concerning your profile on professional social networks, such as LinkedIn, but not limited to, to ensure that the information you provide matches what you have stated, limited only to information of a professional nature, necessary solely for the purpose of assessing the specific risks related to the type of activity that will have to be carried out based on the sought profile, adopting all necessary measures to ensure the proper balance of your interests, rights, and fundamental freedoms with our legitimate interest.
- d) Compliance with obligations provided by law, regulations, or community legislation and defense in court.
- e) Only with your consent, to acquire information related to your professional references from previous employers.



Regarding the purposes under a), b), c), d), we inform you that the processing and communication of your personal data by the Data Controller does not require your consent as the processing falls within the exclusion cases provided for by the European Regulation. Regarding the purpose under e), consent is optional and every Data Subject has the right not to provide it to the Data Controller, without this leading to prejudicial consequences in the selection relationship.



#### LEGITIMATE INTEREST

The Controller does not make use of legitimate interest for the processing of personal data except for the protection of their own rights, namely, to establish, exercise, or defend a right before the courts.



### METHODS FOR DATA PROCESSING

The collected data is processed both in paper form and using computer tools. Appropriate security measures are observed to prevent data loss, unlawful or incorrect uses, and unauthorised access.



### WHO PROCESSES WITH YOUR DATA

The processing of personal data is carried out by authorised personnel or by duly appointed data processors. The updated list of data processors or any autonomous data controllers can be requested from the Data Controller or the Data Protection Officer (DPO).



#### **DATA TRANSFER**

The data will only be transferred only within the EU.

Some data may be transferred to the USA to those companies that are certified under the Data Privacy Framework.

No further transfers outside the EU will be made.



#### RETENTION PERIOD OF YOUR DATA

The personal data contained in the curricula will be processed for the time necessary to contact the candidate and start the selection processes. Curricula deemed to be irrelevant or uninteresting will be immediately canceled or destroyed.



## DATA SUBJECTS' RIGHTS PURSUANT TO ART. 15 EU 2016/679

Data subjects have the right to obtain from the Controller, where applicable, access to their personal data, as well as the rectification or erasure of such data, or the restriction of processing concerning them, or to object to processing (Articles 15 and following of the GDPR). Opposition for marketing purposes is always possible and free of charge. Requests should be addressed to the Data Controller at the contact details provided at the beginning of this notice.



# COMPLAINTS

Data subjects who believe that the processing of their personal data through this website is in violation of the provisions of the Regulation have the right to lodge a complaint with the Supervisory Authority as provided for in Article 77 of the Regulation, or to take appropriate legal action (Article 79 of the Regulation).



In preparing these privacy notices, we have decided to use icons to "make privacy notices simpler, clearer, and immediately understandable, using symbols and icons". The icons were created by Sara Vagni and are covered by CC BY License."