

Information provided by Euren InterSearch srl on the purposes and methods of processing the Candidates' Personal Data

Pursuant to and for the purposes of art. 13 EU Reg. 2016/679 "European Regulation on the protection of natural persons with regard to the processing of personal data" - the company **Euren InterSearch srl**, with registered office in Corso Marconi 13 - 10125 Turin, CF and VAT number 04953990019 ("Euren", the "Company" or "the Data Controller"), in its capacity as **Data Controller** (subject responsible for the decisions regarding the purposes, methods of processing personal data and the tools used, including the security), discloses the following information in relation to the processing of personal data of candidates.

1. Purpose of processing

The collection and processing of personal data are aimed at:

- a) the carrying out, by the controller, of the research, selection and evaluation of personnel, as a subject authorized by the Ministry of Labor, in the interest of the candidate and the client based on specific assignment by subjects, organizations, individual enterprises, professionals and corporate clients, as well as other research & selection agencies, for the purpose of establishing an employment or collaboration relationship. The candidate's data are collected and processed in relation to the specific search and selection process for which they were delivered, but also to ensure the candidate future employment opportunities originated by possible future assignments conferred by the clients to the Data Controller. As a company authorized by the Ministry of Labor for personnel research and selection activities, the Data Controller carries out the processing for the identification of suitable candidates to cover one or more job positions within the client's organization and therefore needs to carry out a plurality of activities such as: the analysis of the organizational context of the client organization; the identification and definition of its needs; the definition of the skills and capacity profile of the ideal candidate; the planning and implementation of the candidate search program through a plurality of recruitment channels; the evaluation of the profiles identified through appropriate selective tools; the formation of the most suitable shortlist of candidates. In particular, the purpose to present candidates with possible future job opportunities through their career makes it appropriate to keep and update the data relating to the candidates in the database of the Data Controller for a reasonably extended period of time;
- b) the management of administrative-accounting processes and the fulfillment of legal obligations.

For the aforementioned purposes, essentially common data will be processed (e.g. contact details, personal data, tax, salary data, professional career details). If communicated spontaneously by the data subject or if requested for specific research campaigns (for example, relating to workers included in protected categories), data of a special categories could also be processed (for example, relating to health, diseases, accidents, as well as data relating to membership of trade unions or political parties). In any case, the processing of these categories of data by the Data Controller does not conflict with the provisions of Law no. 300/1970 (so-called Workers' Statute), of Law no. 135/1990, of Legislative Decree no. 276/2003 ("Biagi Law") and with the rules on equal opportunities or aimed at preventing discrimination.

2. Legal basis of the processing

For the purposes referred to in point 1 a) the legal basis of the processing is:

- the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, pursuant to art. 6, paragraph 1, lett. b) of the Regulations, consisting of adhering to specific research campaigns or the request to be in the Data Controller's databases in order to take advantage of job opportunities or professional growth;
- in the case of the processing of data belonging to special categories (for example in case of a research for employment of subjects belonging to protected underprivileged categories or subjects with special needs), the legal basis of the processing is also represented by the need to fulfill or exercise specific rights of the data subject regarding labor law and social security and social protection, pursuant to art. 9, paragraph 2, lett. b) or for preventive medical purposes pursuant to art. 9, paragraph 2, lett. h);
- the legitimate interest of the data controller and clients, pursuant to art. 6, paragraph 1, lett. f) of the Regulations. It is believed that none of the data processing activities of your personal information could harm individuals in any way; candidate's data processing for research and selection purposes allows the data controller to offer a personalized, timely and effective service, beneficial to the data controller, the client and the candidate. The Data Controller, as an authorized organization for search and selection of personnel, and clients have in fact the

legitimate interest in carrying out the processing activities provided for in this information, including the retention of the candidates' curricula for a period sufficient to guarantee a plurality of potential candidates for each new position requested by the client. The processing activities carried out also respond to a significant interest of the candidate, who can count on the possibility of being contacted also for new professional opportunities. The retention of candidate data in the Data Controller's databases, carried out with suitable technical and organizational measures, promotes effective and dedicated research and selection action and also contributes to the pursuit of the public interest in full employment.

For the purposes referred to in point 1 b) above the legal basis of the processing is represented by the need to comply with legal obligations to which the Data Controller is subject (provided for by corporate, tax and labor law) pursuant to art. 6, paragraph 1, lett. c) and the legitimate interest of managing internal processes pursuant to art. 6, paragraph 1, lett. f) of the Regulations.

3. Data collection

Data are collected by delivery to the Data Controller (through the specific form on the Data Controller's website, by means of tools in third party websites or social media used by the Data Controller, or directly from the data subject during the selection and interview) by the data subjects regarding information relating to their professional background, also as a curriculum vitae ("CV").

The delivery of CV by the data subject can be:

- (a) a spontaneous application by traditional mail, e-mail or other means not originated by the Data Controller. In this case, the candidate is invited to acknowledge in the CV that he has read this information by the following statement: *"the undersigned declares to have read the information on the website www.intersearch.it*
- (b) a reply to specific job offers on behalf of clients published by the Data Controller on any means of communication, on its website or on third-party websites. Also in these cases, the Data Controller will take care about delivering the information;
- (c) filling out the form on the Data Controller's website by selecting the *"Unsolicited Application"* option.

To guarantee the maximum confidentiality and avoid unpleasant contacts for candidates with companies or groups or unwelcome subjects, candidates are invited to indicate, at the same time as submitting their application, the subjects they do not wish to get into contact with, clearly specifying the wording "CONFIDENTIAL".

In other cases, the data could be communicated to the Data Controller by third parties, who have legitimately acquired them (e.g., other research and selection companies) or collected by the Data Controller from publicly available sources (e.g., websites or social media).

4. Principles and methods of data processing

The processing of data will be based on the principle of transparency, will take place in compliance with the rights of the data subjects and will be implemented using tools, including automated ones, suitable for guaranteeing security and confidentiality.

The data will be adequate, relevant and limited to what is necessary with respect to the purposes for which they are processed, accurate and updated; will be processed with the utmost confidentiality, in compliance with the principles stated by the Regulation, any prescriptions issued by the Supervisory Authority and in any case in such a way as to guarantee adequate security, including protection, with adequate technical and organizational measures, from unauthorized or unlawful processing or even accidental loss.

The processing can be carried out on paper, as well as with the aid of automated and electronic tools.

5. Communication of data and subjects authorized to data processing

For the aforementioned purposes, personal data may be disclosed to: clients of the Data Controller, public or private, who have given the Data Controller the mandate to carry out research, selection and evaluation of personnel in their favor and interested or potentially interested in establishing a job relationship; other research and selection agencies, on the basis of collaboration agreements that envisage specific obligations regarding the confidentiality and security of personal data.

If necessary for the selection procedure or in-depth evaluation of candidates, personal data of the data subject may be communicated to subjects in charge of other offices of the Data Controller and to foreign partners of the international network InterSearch (the complete list of partners affiliated to the network can be found at the site <https://intersearch.org>).

For the specific purposes referred to in this information, personal data may also be communicated to subjects pursuant to current legislation or by virtue of administrative measures within the limits necessary for the purpose (eg: INPS, INAIL, Territorial Inspectorate or National Labor Office, Tax Agency, public administrations, social security and assistance funds).

For the purposes referred to in this information and as strictly required in relation to the selection procedure or in-depth assessment of the personnel, the personal data of the data subject may be processed by authorized persons or data processors duly instructed and contractually bound to comply with adequate technical and organizational measures aimed at protecting the data communicated to them. The updated list of data processors and authorized persons is kept at the Data Controller's registered office.

6. Transfer of data abroad

Personal data will not normally be transferred outside the European Economic Area. If this should be necessary (for example, if the Data Controller uses data storage services outside the EEA or in the case of search and selection procedures involving foreign partners of the international network InterSearch), this transfer will be carried out according to the provisions provided by the Regulations and will be communicated to the data subjects.

7. Duration of Processing

The data will be stored for the time strictly necessary to pursue the purposes for which they were collected; therefore, at least until the conclusion of the selection and research procedure for which they were delivered. The Data Controller may keep the data even later, if he believes that there are still processing needs connected with:

- the procedure concluded, also in order to preserve evidence regarding the correct fulfilment of the contract concerning the research and selection activities carried out. In this regard, reference is made to the 10-year limitation period provided for by art. 2946 Italian Civil Code for contractual liability;
- further research and selection purposes relating to the candidate. To achieve the purposes indicated in this information, and also considering the legitimate interests of the Data Controller and the clients, in particular that of guaranteeing an effective research and selection activity that can promptly rely on a sufficiently large database of profiles, also in consideration of the clients' business sectors and the restricted local areas in which the Data Controller operates, it is considered reasonable not to indicate a specific duration, but to provide for the retention of candidate data as long as there are reasonable job opportunities.

The Data Controller will in any case delete the CVs or any document containing personal data deemed non-compliant or no longer necessary for the purposes referred to in this information.

8. Rights of the data subject

The data are available to data subjects in an intelligible format so that, at any time, she/he will be able to know the origin, purpose and methods on which the processing is based, to obtain access to them, to update them, the rectification, integration, cancellation, transformation into anonymous format, limitation of processing, to arrange for the blocking of data processed in violation of the law and to obtain a copy of it in a structured format, commonly used and readable by an automatic device or to transmit such data to another data controller without impediments.

You can exercise these rights towards the Data Controller by sending a communication to the e-mail address privacy@intersearch.it.

You also have the right to lodge a complaint with the Supervisory Authority, represented in Italy by the Garante per la Protezione dei Dati Personali. For information in this regard, please refer to the website of the Garante at www.garanteprivacy.it.

9. Equal opportunities

Euren InterSearch srl conducts personnel selection processes by pursuing equality between workers and not discriminating against candidates of one or the other sex, in compliance with current legislation.

10. Authorization to exercise the profession

Euren InterSearch srl is a company authorized by the Ministry of Labor and Social Policies to deliver professional services of Research and Selection of Personnel with Protocol 1317 dated 15.01.2007.

