



Sede Direzionale - Via Mecenate, 86 - 20138 Milano
Tel. +39 02 58030.1 - Fax +39 02 5063886
www.alcantara.com

PRIVACY POLICY

Alcantara S.p.A. is constantly committed to respecting the privacy of individuals with whom it comes into contact, in accordance with the provisions of Regulation (EU) no. 679/2016 ("GDPR") and the national privacy legislation (Legislative Decree no. 196/2003 and subsequent amendments and additions).

Pursuant to Article 13 of the GDPR, below we provide you with some information necessary to illustrate how we will use and process the personal data you provided by sending us your CV, either spontaneously or through research and selection companies/employment centres, or that we will otherwise acquire during the selection process, including any interviews (hereinafter the "**Personal Data**" or "**Data**").

1. DATA CONTROLLER

The Data Controller of the Personal Data is Alcantara S.p.A. (with registered office in Milan, Via Mecenate 86) (hereinafter "**Alcantara**" or "**we**"), which is responsible for the legitimate and correct processing of your Data.

2. DATA PROCESSED

The Data we will process include:

- (a) all the Personal Data that you have included in your CV (such as, general information, age, date and place of birth, identification and contact Data - e.g. email, telephone -, professional experience, qualifications, photos, hobbies) ;
- (b) "Sensitive" Data that you will provide to us as they are necessary for the selection or that will be provided to us by research and selection companies/employment centres, such as Your possible belonging to a category protected by law, the possibility to benefit from social security contributions or Data concerning Your health (such as a disability) (hereinafter, jointly, "**Sensitive Data**");
- (c) the personal information you will share with us during the interview;
- (d) the additional information about you that the research and selection companies or the employment centres could provide us;
- (e) assessments on the person, which our examiners shall track for the selection process;
- (f) date and time of access to our Milan offices or to our Nera Montoro facility.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

(a) Your Data, including any Sensitive Data You provided us with, will be processed to allow us **to select personnel** (employees, temporary employees, trainees, interns, etc.) and to evaluate the professional profiles in our interest and manage all the phases related to the selection (communications with Data subjects, job interviews, etc.)

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The **legal basis** for the processing of Your Data for the purpose above is represented by Your **consent**, pursuant to the provisions of Article 6.1 letter a) of the GDPR and, with reference to any possible Sensitive Data, by Article 9.2 letter a) of the GDPR. As far as it is necessary for selection purposes, Data concerning Your health or Your belonging to a category protected by law may also be processed by us without Your consent, in order **to comply with legal obligations or to exercise our specific rights** under labour and social security and protection law, pursuant to Article 9.2 letter b) of the GDPR.

(b) The Data indicated in paragraph 2(f) above, together with Your name and surname, will be used for the sole purpose of allowing Your safe access to our Milan offices or to Nera Montoro facility.

The **legal basis** for the processing of Your Data for such further purpose is represented by our **legitimate interest** in ensuring a high security level within Alcantara workplaces, which we believe is not overridden by any of Your rights, interests or fundamental freedoms.

4. DATA RECIPIENTS - DATA TRANSFER TO THIRD COUNTRIES/INTERNATIONAL ORGANISATIONS

As part of the Data processing for the purpose referred to in paragraph 3 above, Your Personal Data may be disclosed or otherwise made accessible to third parties belonging to the following categories:

- Personnel search and selection companies/employment agencies;
- employment centres;
- IT management/maintenance service providers of corporate information systems where Data will be stored, including system administrators;
- companies providing portage service and services for guarding;
- in case of emergency, Public Safety Authority;
- auditing firm and Alcantara Supervisory Body.

Where necessary, we will appoint our third parties as our Processors pursuant to Article 28 of the GDPR.

Upon request addressed to us through the contact details specified in paragraph 7 below, we will inform You of the third parties to which Your Data have been disclosed.

Within our company organisation, Your Data will be disclosed and processed by the personnel in charge of the HR department and by the managers of the various company departments involved in the selection process. Corporate IT department's employees may also access to Your data. We will duly authorise and instruct these parties with regard to the processing pursuant to Article 29 of the GDPR.

Your Data will not be transferred to countries outside the European Economic Area or to international organisations.

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5. DATA STORAGE PERIOD

With reference to the purpose referred to in paragraph 3 (a) above, Your Data will be processed and stored in our archives for the period that is necessary to allow us to complete the selection process; therefore we have decided to erase them after six months from the closing date of the selection process in which You participated, except in cases of special needs related to periods of strong business expansion that may require a longer storage time. Only in case, as a result of the selection, a working relationship is established with you, Your data will be processed further for this purpose, according to a separate privacy policy that will be released to You at the time of the employment.

With regard to the Data processed for the purpose referred to in paragraph 3(b) above and entered in the records concerning the accesses to Alcantara offices/facility, we inform you that they will be erased after 15 months from their registration.

6. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION - CONSEQUENCES OF ANY REFUSAL

The provision of Your Data for the purposes referred to in paragraph 3 above is optional and, failing that, you cannot participate in our selection process.

7. DATA SUBJECT RIGHTS

Pursuant to Articles 13, paragraph 2, letters b), c) and d), 15, 16, 17, 18, 19, 20 and 21 of the GDPR, we inform You that:

- a) You have the right to request **access** to Your Personal Data together with information on the processing purpose, category of Data processed, subjects or categories of subjects to whom they have been or will be communicated (with indication if these subjects are located in third countries or are international organisations), whenever possible the storage period and/or the criteria used to determine such a period, the existence of Your rights to correct and/or erase the Personal Data, limit and object to the processing. You have the right to lodge a complaint with a supervisory authority, to know the origin of the Data, the existence of any automated decision-making and its logic. If You exercise this right You will receive an electronic copy of Your Data that are being processed unless You provide us with other instructions.
- b) You also have the right to obtain:
 - i. the **correction** of Your Data, if they are incorrect or incomplete;
 - ii. the **erasure** of Your Data, given one of the conditions set out in Article 17 of the GDPR (for example: Your data are no longer necessary for the purposes they were collected, You decide to withdraw your consent to the processing - if this represents the legal basis - and there is no other legal basis for the processing, You object the processing and there is no other Data Controller's prevailing legitimate interests, Your Data are unlawfully processed);

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- iii. the **restriction** of the processing of Your Data 1) for the time necessary for Alcantara to ascertain the accuracy of Your data (if you objected), or 2) if the processing is unlawful and You request the restriction of related processing instead of the erasure of Your Data, or 3) when Alcantara no longer needs Your Data but they are necessary for You to ascertain, exercise or defend a right in court, or, finally, 4) for the time necessary to assess the possible prevalence of the Data Controller's legitimate reasons with respect to Yours, if you have objected to the processing of Your Data pursuant to point c) below;
 - iv. Your Data in a structured, commonly used and readable by an automatic device, also in order to send the Data to another data controller if the processing is based on consent or on a contract and is carried out by automated means (so-called **data portability** right). If You are interested, you can ask Alcantara to send Your Data directly to the other data controller, if this will be technically feasible.
- c) You have the right to **object** to the processing of Your data, if such processing is carried out pursuant to Article 6.1 letter e) (i.e. to fulfil a legal obligation to which the Data Controller is subject) or letter f) (i.e. to pursue a legitimate interest of the Data Controller) of the GDPR, unless there are legitimate reasons for the Data Controller to proceed with the processing, pursuant to Article 21 of the GDPR.
 - d) You have the right to **revoke the consent given at any time** for the purpose described in paragraph 3 (a) above, without prejudice to the lawfulness of the processing of Your Data based on consent and carried out before the revocation.
 - e) If You are not satisfied with the processing of Your data, You may **lodge a complaint** with the Data Protection Authority following the procedures and instructions published on the official website of this Authority (www.garanteprivacy.it).
 - f) Any correction or erasure of Your Data or processing restrictions made upon Your request - unless this proves impossible or involves a disproportionate effort - will be **communicated by us to each of the recipients** to whom your Personal Data may have been transmitted in accordance with this policy.

The exercise of the previous rights is not subject to any form of constraint and is free of charge. We may only ask You to verify Your identity before taking further action upon Your request.

To exercise Your rights, You can contact Alcantara by sending a registered letter with return receipt to the contact details specified in point 1 above or by email writing to the following address: privacy@Alcantara.com.

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