

Privacy notice pursuant to art. 13 of regulation EU 2016/679

For candidates for recruitment, or employment relationships or applicants for any form of collaboration.

We take personal data protection extremely seriously, this is why we wish to provide you with the following information on the ways in which your personal data are processed and on the rights that you have pursuant to the laws in force on personal data protection, with particular reference to Regulation (EU) 2016/679 (hereinafter also referred to as the: "GDPR").

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<i>Revision</i>	<i>Approved by</i>	<i>Date</i>

1. Data Controller

With reference to the processing purposes detailed in this document, the joint Data Controllers*, pursuant to article 26 of the GDPR, are the following:

Inxpect S.p.A.
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E-mail address: hello@inxpect.de

*The essence of the arrangement is made available to the data subject on request, any such request shall be submitted to the addresses indicated hereunder for the purpose of exercising such rights.

Data Protection Officer (DPO):

Avv. Matteo Alessandro Pagani
via Turati, n.26
20121 Milano (MI) - Italy
E-mail address: dpo@inxpect.com

2. The categories of personal data which are processed

The data processed by the Data Controller are only those defined as “personal data” according to Art. 4.1 of the GDPR.

Specifically, the applicable categories of personal data may include, but are not limited to, the following examples:

- Biographical and personal identification data (name, date of birth, place of birth, nationality, tax identification code, marital status, employment status/profession, etc.);
- Contact data (address, e-mail, telephone number and similar information);
- Data relating to education and employment, including work-related experience and activities;
- Special categories of personal data (such as, for example, general state of health, political opinions, religious or philosophical beliefs, membership of trade unions).

3. Purposes and legal basis for the processing of personal data

3.1. Processing for the purpose of compliance with a legal obligation (Art. 6 paragraph 1(c) of the GDPR)

The purpose of processing personal data is to enable the assessment of the application submitted by the data subject (candidate), whether this is in response to a specific vacancy or a spontaneous application, and in particular, in this context, for the following purposes:

- a. Fulfilment of legal obligations related to the application and to the possible recruitment of the candidate for the position in question (e.g., checking whether the candidate belongs to a legally protected class of worker).

The retention period for the personal data, in relation to the purposes referred to in this section, is: for purpose a): 24 months from when consent is granted or from receipt of a spontaneously-submitted curriculum vitae.

3.2. Processing for the purpose of performing a contract or in order to take steps prior to entering into a contract (Art. 6, paragraph 1(b) of GDPR)

The purpose relative to the steps taken prior to entering into a contract is:

- a. Managing the selection process with reference to one or more vacancies, with the aim of establishing an employment contract (including, but not limited to, the assessment and identification of one or more individuals to fill the aforementioned positions, and therefore the collection of any information that is necessary for recruitment and those needed in order to enter into the employment contract in question).

The retention period for the personal data, in relation to the purposes referred to in this section, is: for purpose a): 24 months from when consent is granted or from when the information is acquired, except in the event of employment (in which case the retention period will be based on the established schedules or as necessary in relation to the single employment relationships which are established and as indicated in the specific information provided in relation to the respective circumstances).

3.3. Processing purposes for which the Data Subject has granted consent (Art. 6, paragraph 1(a) of the GDPR)

The processing purpose which requires consent is:

- a. management of the selection process and evaluation of the candidate's CV in the broadest sense of the term (processing activities that are not related to the steps taken prior to entering into a contract and/or to the processing of special categories of personal data).

The retention period for the personal data, in relation to the purposes referred to in this section, is: for purpose a): 24 months from when consent is granted or from receipt of a spontaneously-submitted curriculum vitae.

4. The recipients or categories of recipients of the personal data* (Art. 13, paragraph 1(e) of the GDPR)

In the framework of the aforementioned purposes, the Data Controller may transmit your data to:

- The Data Controller's own offices and internal departments;
- companies and professional experts that provide IT services;
- a doctor specialised in occupational medicine (if a preventive medical examination or any other action is required according to the occupational health plan);
- payroll/employment consultants, professional service companies in general (lawyers, accountants, etc.);
- consultancy firms.

*The complete, up-to-date list of the Data Controllers, Data Processors and Data Recipients (pursuant to art. 4.9 of the GDPR), both EU- and non-EU, is available at the Data Controller's offices.

5. The recipients or categories of recipients of the personal data (Art. 13, paragraph 1(f) of the GDPR) and the transfer of personal data to non-EU countries

You are hereby informed that the Data Controller does not intend to transfer your personal data to countries outside the EU and EEA for the purposes stated above.

6. The Rights of the Data Subject (Art. 13, paragraph 2(b) of the GDPR)

The data subject is entitled to exercise the following rights:

- Right of access by the data subject [art. 15 of the EU Regulation] (the data subject's right to access information on whether or not Personal Data concerning them are being processed and to obtain a copy if necessary);
- Right to rectification of Personal Data [art. 16 of the EU Regulation] (the data subject has the right to obtain the rectification of Personal Data concerning them which are inaccurate);
- The right to erasure of Personal Data without undue delay ("the right to be forgotten") [art. 17 of the EU Regulation] (the data subject shall have the right to obtain the erasure of their Personal Data);
- The right to the restriction of processing of Personal Data in the cases envisaged in article 18 of the EU Regulation, such as in the case of unlawful processing, or where the accuracy of the personal data is contested by the data subject [art. 18 of the EU Regulation];
- The right to data portability [art. 20 of the EU Regulation] (the data subject shall have the right to receive the Personal Data concerning them in a structured format in order to transmit those data to another controller in the cases envisaged in this same article);
- The right to object to the processing of Personal Data [art. 21 of the EU Regulation] (the data subject shall have the right to object to the processing of their personal data);
- The right not to be subject to automated individual decision-making [art. 22 of the EU Regulation] (the data subject shall have the right not to be subject to a decision based solely on automated processing).

Further information on the rights of the data subject may be obtained from the website www.inxpect.com or by requesting the full text of the above-mentioned articles from the Data Controller.

With regard to the processing purposes for which consent is required, the data subject may withdraw consent at any time and with immediate effect, subject to the terms established by law. In general terms, withdrawal of consent only produces effects for the future.

The aforementioned rights may be exercised in accordance with the provisions of the Regulation, and by sending an e-mail to the following address: privacy@inxpect.com.

In compliance with art. 19 of the EU Regulation, the Data Controller shall communicate any rectification or erasure of personal data or requests for restriction of processing to each recipient to whom the personal data have been disclosed, where possible.

In order to ensure a rapid response to any requests you may submit in exercising the aforementioned rights, such requests may be addressed to the Data Controller using at the contact details indicated in point 1.

7. The right to make a complaint (Art. 13, paragraph 2(d) of the GDPR)

Data Subjects have the right to lodge a complaint with the Italian Supervisory Authority for the protection of personal data, if they consider that processing activities regarding their personal data have been carried out in breach of the applicable legislation. The procedures for lodging a complaint are described by the Supervisory Authority at the web address:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>

or a written communication can be sent to the Italian Supervisory Authority for the protection of personal data.

8. The possible consequences of failure to provide personal data and how personal data is to be provided (art. 13 paragraph 2 (e) of the GDPR)

8.1. Compliance with legal or contractual requirements

In the cases in which the legal basis for the stated purpose of personal data processing activities is a legal or contractual (or pre-contractual) requirement, please be informed that the data subject is obliged to provide the data requested.

Failure to do so would make it impossible for the Data Controller to proceed with pursuing the specific processing purposes.

8.2. Cases in which the Data Subject grants consent

For the purposes which require consent, the data subject can withdraw such consent at any time with immediate effect, subject to the terms established by law. In general terms, the withdrawal of consent shall only be effective for the future, therefore any processing that has been carried out before consent was withdrawn is not affected and will remain legitimate.

Failure to grant consent, or partial consent, may mean that the full delivery of services or the performance of activities is not guaranteed (e.g., participation in the selection and recruitment process), with reference to the individual purposes for which consent is denied.

When data are no longer necessary, they are routinely erased, if erasure is impossible or only possible by making a disproportionate effort due to the specific storage method, the data shall not be processed and must be stored in areas that are not accessible.

9. The existence of an automated decision-making process (including profiling)

The use of decision-making processes based solely on automated procedures, as detailed in article 22 of the GDPR is currently ruled out. Should it be decided in the future to begin using such processes for individual cases, the data subject will receive separate notification if this is required by law or an update to this privacy notice.

10. Data processing methods

The personal data will be processed in paper, electronic and digital format and will be entered into the relevant databases (candidates, etc.) which may be accessed by operators who would therefore become aware of the data; all such operators are specifically appointed by the Data Controller as Data Processors and Operators Authorised to process personal data, they may be required to carry out operations which include consultation, use, processing, comparison and any other appropriate operations that may also be automated, in compliance with the provisions of law, and which are necessary to ensure, inter alia, the confidentiality, security and accuracy of the data, as well as updating the data and ensuring relevance with respect to the stated purposes.