

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

### **JOB SEEKERS**

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The Company, **Campus X S.r.l.** with registered office in Rome, Via Abruzzi n. 25, in its capacity of Data Controller (hereinafter also referred to as "Data Controller"), protects the personal data of the Data Subjects by ensuring confidentiality and compliance with the regulations in force and guaranteeing the necessary level of protection against any event that might put them at risk of being breached.

Pursuant to Article 13 of the GDPR, Campus X, in its capacity of Data Controller, is required to provide you with the following information regarding the purposes and methods with which the personal data concerning you that you have provided in the personnel selection process in which you are participating are processed.

We would also like to inform you that Campus X has appointed a Data Protection Officer (hereinafter also referred to as "DPO") whom you may contact if you have any questions about our policies and practices relating to the processing of personal data.

You can contact the DPO/DPO at the addresses and contact details below:

[dpocx@cx-place.com](mailto:dpocx@cx-place.com)

#### **1. TYPE OF PERSONAL DATA PROCESSED**

In particular, the following personal data concerning you may be processed:

common personal data:

- name, surname, date of birth, tax code, e-mail, telephone number, address;
- CV data, including any pictures attached to the CV;

special categories of personal data:

- data concerning your health if you belong to protected categories.

#### **2. PURPOSE AND LEGAL BASIS OF PROCESSING**

Your personal data will be processed for the following purposes:

a) research and selection of personnel consisting in the search for candidates for positions open at Campus X through the collection of applications and the relevant CVs and the subsequent insertion in the organisational context of the Data Controller through the establishment of the employment relationship;

(b) fulfilment of legal obligations that may derive from the selection process.

The legal basis underlying the processing operations referred to in this paragraph is:

for common personal data:

Article 6(1)(b) GDPR "processing is necessary for the performance of pre-contractual measures taken at the request of the data subject";

for special categories of personal data:

Art. No. 9 par. 2 letter b) GDPR "processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the Data Controller or the Data Subject in the field of labour law and social security and social protection, insofar as it is authorised by Union or Member State law or by a collective agreement under Member State law, subject to appropriate safeguards for the fundamental rights and interests of the Data Subject".

#### **3. TREATMENT MODES**

The processing of your personal data shall be carried out mainly through computerised tools and by means of paper media by people within the Owner's organisation who are duly authorised and trained for this purpose in accordance with the methods and with the means suitable to guarantee the security and confidentiality of the personal data themselves, in compliance with the provisions of the GDPR.

The Data Controller carries out periodic checks to ensure that personal data are not processed, collected, filed or stored that are not necessary in relation to the processing operations and related purposes as listed in point n. of 2<sup>nd</sup> this information notice.

In carrying out these activities, Campus X undertakes to:

- a) ensure the accuracy and updating of the personal data processed, and promptly receive any corrections and/or additions requested by you;

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b) notify you, within the time limits and in the cases provided for by the legislation in force, of any breaches of personal data;

(c) ensure that processing operations comply with the applicable legal provisions.

#### **4. RECIPIENTS OF PERSONAL DATA**

Personal data processed for the purposes referred to in point n. of this information notice may be communicated:

- to duly authorised internal members of the Controller's staff for the parts of the processing for which they are responsible;
- to external parties such as:
  - providers of IT infrastructure and solutions;
  - partner companies or otherwise connected to the Controller.

Communication concerns the categories of personal data whose transmission to the above-mentioned third parties is necessary for the performance of the activities and for the purposes set out in this information notice and, in any case, in connection with the pre-contractual relationship with you.

Your consent is not required for the processing concerned, as it is carried out in order to execute pre-contractual measures taken at your request or, in any case, to fulfil any legal obligations arising therefrom.

Under no circumstances may your personal data be disseminated.

#### **5. SOURCE OF DATA**

Your personal data may also be collected from third parties such as:

- intermediary agencies in the field of personnel search and selection;
- companies carrying out labour supply activities;
- head hunter;
- universities.

#### **6. EXTRA EU/EEA TRANSFER**

The Data Controller does not transfer your personal data abroad (for the purpose of this information notice "abroad" means any country not belonging to the European Economic Area).

#### **7. PERIOD OF RETENTION/DATA RETENTION**

Your personal data will be processed by the Data Controller for the duration of the selection procedure.

It is in the interest of the Data Controller to keep the personal data you have provided for the time necessary to evaluate your application for future open positions and in any case for no longer than two (2) years from receipt of the data.

Longer retention periods may apply in the event of specific legal obligations or in the event that the Data Controller receives requests from public authorities or for additional requirements to protect your rights or the rights of the Data Controller.

#### **8. RIGHTS OF THE DATA SUBJECT**

Pursuant to EU Reg. n°2016/679 you have the right to:

- obtain confirmation of the processing carried out by the Data Controller on your personal data;
- to access your personal data and to know their origin (when your personal data are not obtained directly from you but are collected from third parties), the purposes of the processing, the data of the persons to whom they are communicated (recipients), the period of storage of the personal data or, failing that, the criteria for determining this period;
- obtain the rectification of your personal data;

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- obtain the deletion of your personal data from the Data Controller's databases if they are no longer necessary for the purposes for which they were collected or if the processing is unlawful and in the other cases referred to in Article 17 GDPR;
- limit the processing of personal data relating to you, for example, where its accuracy is contested, for the period necessary for the Controller to verify its accuracy and in all other cases referred to in Article 18 GDPR;
- to obtain your personal data in electronic format, also in order to be able to communicate them to another data controller (portability).

You may assert your rights by writing to the Data Controller at the following address:

[dpocx@cx-place.com](mailto:dpocx@cx-place.com)

The Controller shall do so without delay and, in any event, no later than one month after receipt of the request. The deadline may be extended by two months, in which case the Controller shall inform you within thirty days of the reasons for the extension.

#### **9. COMPLAINT**

You have the right to file a claim with the Data Protection Authority.

If you reside in a different member state or if a breach of data protection law occurs in an EU country other than the country where Campus X is based, you must lodge a complaint with the data protection authority of that country. The lodging of a complaint is without prejudice to the possibility of bringing any other legal action.

#### **10. PROVISION OF DATA AND CONSEQUENCES**

The provision of data is optional but necessary for the purposes set out in point n. 2 of the information notice.

Refusal to provide the personal data requested as part of the selection procedure may affect the selection procedure itself.

#### **11. EXISTENCE OF AUTOMATED DECISION-MAKING**

Pursuant to Art. 13 par. 2 lett. f) of the GDPR Campus X informs you that your personal data are not and will not be subject to any processing operation involving automated decision-making or any profiling activity.