

**PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA  
PURSUANT TO ART. 13 OF THE REGULATION (EU) 2016/679**

**Data subjects: candidates**

**Dear Candidate,**

in compliance with the Regulation (EU) 2016/679 (hereinafter referred to as “GDPR”), as Data Controller of your personal data, **TECHNACY S.R.L.** informs you herewith that the above-mentioned regulation provides for the protection of data subjects as to the processing of their personal data and that such processing shall be carried out according to the principles of lawfulness, fairness, transparency and protection of your privacy and rights.

For the purposes of personnel selection for open job positions (present and future), the Data Controller will process personal data collected both directly from the person concerned in presence and, possibly, through the website or by email such as, for example: personal and contact data (name and surname, telephone or mobile number, email address) and professional skills.

Through the transmission of your CV, the Data Controller may also process special categories of personal data as defined in Article 9 of the GDPR, such as, for example, data relating to health (e.g. in the case of positions reserved for 'protected categories'). In this regard, unless strictly necessary, you are requested not to provide such information. Otherwise, should you provide it, the processing of such data will only be carried out if necessary to pursue the stated purposes and in accordance with the “Prescrizioni relative al trattamento di categorie particolari di dati nei rapporti di lavoro” (Prescriptions concerning the processing of special categories of data in labour relations) (Aut. Gen. no. 1/2016) and the provisions of the GDPR.

The Data Controller also informs you that, if included in your CV, your photograph will also be processed. Should you wish to restrict this processing, please contact us at [dpo@technacy.it](mailto:dpo@technacy.it)

**Purpose and legal basis of processing:** your data will be processed for the following purposes:

- Selection of personnel for the establishment of an employment relationship.
- Sending communications (by e-mail, post, text message, telephone call, etc.) to ensure contact for the possible establishment of an employment relationship.

Legal basis: execution of pre-contractual measures with reference to Art. 6 par. 1 letter b) of the GDPR, Art. 111 bis of Legislative Decree 196/2003, Aut. Gen. 01/2016 of the Data Protection Authority.

**Consequences of failure to provide the required data:** The processing of the data contained in your CV is necessary as it is strictly instrumental to the selection process. In its absence, Technacy will not be able to contact you and/or evaluate your professional profile.

The refusal to process the photograph will in no way prejudice the selection process.

**Data processing method:** Processing is carried out using manual and/or computerized and telematic tools, in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the physical and logical, organizational measures provided for by the provisions in force, so as to minimize the risks of destruction or loss, unauthorized access, modification and unauthorized disclosure in compliance with the methods set out in Articles 5, 32 of the GDPR.

**Recipients:** in order to carry out some activities or support the functioning and organization of the activities, some data may be communicated or disclosed to the following categories of recipients:

Third parties: (disclosure to: natural or legal persons, public authorities, entities, or institutions)

other than the data subject, the Data Controller, the Data Processor and authorised persons responsible for data processing) including:

- Subjects/Bodies which, by legal obligation, may be granted access to your data;
- Where necessary: any personnel selection companies. They act, as the case may be, as Data Processors or autonomous Data Controllers;
- Any companies with which the Data Controller has entered into commercial agreements for the development and management of its products, acting, depending on the circumstances, as joint data controllers or data processors;
- Any other parties whose disclosure of data is necessary for the achievement of the above-mentioned purposes.

**Data Processors:** (the natural or legal person or public authority, entity or institution that processes personal data on behalf of the Data Controller)

- Companies and other persons, consultants and freelancers to whom permission was granted for the management of the fulfilment of tasks related to the selection phase of the candidates;
- Providers of IT, web, or other services required to achieve the purposes necessary for the management of the selection process, and in particular of communications.

**Recipients inside the company:** your data shall only be processed by personnel expressly authorized thereto by the Data Controller.

**Transfer of personal data to third countries:** the Data Controller shall not transfer any personal data to any non-EU country. Should any transfer of data be necessary, the data subject shall be informed thereof in advance and appropriate safeguards shall be adopted for the transfer of data to the relevant recipients, which, as the case may be, might consist in the check of the existence of any adequacy decisions by the Commission with regard to the country of destination, the signing of standard contractual clauses or, the verification of the adoption of any additional measures in transposition of EDPB Recommendation 01/2020.

**Disclosure:** Your personal data will not be disclosed in any way.

**Retention period:** the Data Controller applies strict data retention with a view to the principles of proportionality, necessity and data minimisation. Therefore, the information collected and CVs will be processed and kept for the time strictly necessary to achieve the purposes for which they are collected, unless overriding legal obligations and/or the need to defend the company in court require different retention periods.

In this case, in light of Technacy's internal organisational structure and the complexity of the production process, personal data will be processed and stored for 12 months from receipt of the CV. After this period, documents containing personal data will be destroyed or the personal data will be irreversibly anonymised.

Should the selection process be successful, your CV will be included in the "employee file" and your data will be processed in the manner indicated in the privacy policy prepared for employees.

**Automated processing and profiling:** processing does not occur with the aid of automated decision-making processes or with the use of profiling techniques.

**Data Controller:** according to the regulations in force, the Data Controller shall be **TECHNACY S.R.L.**, with registered office and operational headquarters in Via Molveno 5, 48015 Cervia (RA), Italy, tax code and VAT registration number 02399920392, represented by its legal representative pro tem.

For further information on the data provided, you may send an email to [dpo@technacy.it](mailto:dpo@technacy.it). Additional information on the privacy policies adopted by our company is available on our website [www.technacy.it](http://www.technacy.it).

**The Data Protection Officer (“DPO”)** can be contacted at the following email address: [dpo@technacy.it](mailto:dpo@technacy.it).

#### **Regulation (EU) 2016/679: Art. 15, 16, 17, 18, 19, 20, 21 - Rights of the data subject**

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her do exist, even if not yet registered, and to be provided such data in an intelligible form.
2. The data subject shall have the right to obtain information about:
  - a. the origin of personal data;
  - b. the purposes and methods of processing;
  - c. the logic applied in the event of processing using electronic systems;
  - d. the identification data of Data Controller, Data Processors and designated representative pursuant to art. 5, par. 2, of the GDPR;
  - e. the entities or categories of entities to which the personal data may be disclosed or which may acquire such data as designated representative on the country’s territory, Data Processors or entities in charge of data processing.
3. The data subject shall have the right to obtain:
  - a. the updating or rectification of data as well as to have incomplete personal data completed, if he/she wishes;
  - b. the erasure or anonymisation of the data as well as the blocking of the data processed in violation of the law, including those that do not need to be kept in relation to the purposes for which data have been collected and then processed;
  - c. the confirmation that the subjects to which the data have been communicated or disclosed have been informed of the operations under letter a) and b), including their content, unless this proves impossible or would involve a disproportionate effort with respect to the protected right;
  - d. data portability.
4. The data subject shall have the right to object, in whole or in part:
  - a. to the processing of personal data concerning him or her for legitimate grounds, even though such data are relevant for the purpose for which they are collected.

**Complaint:** if applicable, the data subject shall also have the right to lodge a complaint with the Italian supervisory authority called “Garante per la protezione dei dati personali” according to the established procedures. For further information and to exercise your rights, please apply to the Data Controller using the above contact details.