



## Privacy Policy Statement - Articles 13 and 14 of Regulation (EU) 2016/679 Privacy Policy Statement – Job applicants

### Who are we and what do we do with your personal data

Green Oleo s.p.a., hereinafter the Data Controller, safeguards the confidentiality of your personal data and guarantees them the necessary protection against any event which may put their security at risk.

For this purpose, the Data Controller implements policies and practices with regard to the collection and use of personal data and the exercise of your rights under the relevant law. The Data Controller takes care to update the policies and practices adopted for the protection of your personal data whenever necessary, and always in the event of regulatory or organisational changes which may affect the processing of your personal data.

### How do we collect and process your data and for which purposes

The Data Controller collects and/or receives your data, such as your name, surname, tax code, date and place of birth, home address, email address, landline and/or mobile phone number, CV data and also data concerning your health if you have provided them by means of your CV or if the post you have applied for is reserved to members of protected categories. The Data Controller requires these data to verify the bases for your employment and/or for the start of a working relationship between you and the Data Controller. Your personal data are mainly communicated to third parties and/or recipients whose activity is necessary for the performance of the activities inherent in the aforesaid purposes. All disclosure not for the above purposes will be submitted for your consent. The Data Controller does not transfer your personal data abroad. Your personal data will not be in any way disseminated or disclosed to unspecified and unidentifiable subjects, even as third parties.

Your personal data will be processed for:

#### 1) recruitment and/or the start of a working relationship

Your personal data are processed for the activities arising from the management of the personnel recruitment operations carried out by the Data Controller, including:

- recruitment for positions as requested by the Data Controller;
- the collection of applications and CVs, which may be obtained from two types of sources:
  - within the Data Controller's organisation (job vacancies advertised by the Data Controller, recommendation by the Data Controller's staff, unsolicited submission of CVs);
  - outside the Data Controller's organisation (job vacancies advertised through recruitment agencies, temporary employment agencies, universities, educational institutions, and advertisements in newspapers, magazines and specialist journals);
- the initial screening of the CVs received;
- the organisation of interviews for selection purposes;
- the employment within the Data Controller's organisation of the candidate considered most suitable;
- the fulfilment of specific obligations or the performance of specific duties arising from laws, regulations and corporate or other collective employment contract and/or the working relationship, and for the identification of any benefits applicable to any contract relationship with parties who belong to protected categories.

Your personal data are also collected from third parties, including, for example:

- other data controllers;
- private entities which provide contracting, intermediation, recruitment, training and job-seeking services;
- universities and educational institutions;
- household and family members.

The personal details processed by the Data Controller for the above purposes include:

- 1) name, surname, tax code, date and place of birth, physical and digital address, landline and/or mobile phone number;
- 2) CV data;
- 3) data relating to health if required by the type of candidacy, or if you have provided them, also through your CV.

This is subject to the right to rectification of the data issued to or collected by the Data Controller where appropriate.

#### 2) for communication to third parties and recipients

Your data will not be communicated to third parties/recipients for their own independent purposes unless:

1. you authorise it;
2. this is necessary for the fulfilment of obligations arising from the relevant law (e.g. for the protection of your rights, etc.);
3. the disclosure is to private entities which provide contracting, intermediation, recruitment, training and job-seeking services, universities and educational institutions, family and household members, and data and IT service companies.

The personal details processed by the Data Controller for this purpose include:

- o name, surname, tax code, date and place of birth, home and email address, landline and/or mobile phone number;
- o CV data;

and if necessary, and with all the relevant guarantees, including those which require the pseudonymization, aggregation and/or encrypting of data,

- o data relating to your health if required by the type of candidacy, or if you have provided them, also through your CV.

### What happens if you do not supply your data

Some of your data, collected or otherwise obtained by the Data Controller, are necessary, and in the event of failure to supply them it is impossible for the Data Controller to proceed with the operations relating to the main purpose for which the data are processed:

- to assess your application within the recruitment process undertaken by the Data Controller, also through its suppliers (third parties/recipients);
- to manage all phases of the staff selection process;
- for fulfilment of the obligations which derive from it.

The Data Controller also processes your data with regard to specific lawful interests which do not jeopardise your right to privacy, such as those which:

- allow the prevention of IT accidents and the reporting of personal data breaches to the controlling authorities or the notification of the same to users, if necessary;
- enable disclosure to third parties/recipients for activities related to the recruitment process.

### How and for how long are your data stored

Your personal data are processed using both electronic and manual tools made available to the entities acting under the authority of the Data Controller, which are suitably authorised and trained for this purpose. The paper and above all the electronic database files where your data are stored and conserved are protected by means of effective security measures which prevent the data breach risks considered by the Data Controller. The Data Controller performs regular, constant checks on the measures adopted, especially for electronic and digital tools, to guarantee the confidentiality of the personal data they are used to process, file and conserve, above all those in special categories.

The databases are inside the EU (and EEA) and no connection or interaction with databases abroad is envisaged.

### How



Data are processed on paper media or using computerised procedures by specifically authorised and trained in-house staff. They are granted access to your personal data to the extent and within the limits necessary for the performance of the processing activities which concern them. Your data, especially those classified as special data, are processed separately from other data, also by means of pseudonymization or aggregation methods which make it difficult to identify you.

The Data Controller regularly checks the tools by which your data are processed and the security measures provided for them, which are constantly updated; it ensures, also through the authorised data processors, that no personal data the processing of which was not necessary have been collected, processed, filed or stored; it ensures that the data are stored with guarantees of integrity and authenticity, and that they are used for the purposes of the processing actually undertaken.

#### **Where**

Data are stored in paper, IT and computer files in the European Economic Area and protected by suitable security measures.

#### **For how long**

Personal data processed by the Data Controller are stored for the time necessary for the recruitment procedures and all cases for no more than 2 years after their collection, unless an employment relationship and/or working relationship is established. This is with the exception of cases in which the rights arising from the data processing have to be legally enforced, in which case your data (only those necessary for this purpose) will be processed for the time essential for the said enforcement. However, you retain the right to object to the processing of the data at any time on the basis of lawful interest for reasons related to your specific circumstances.

#### **What are your rights**

At any time as long as the processing of the data continues, free of charge and without any particular obligations or formalities for your request, you may:

- obtain confirmation of the processing carried out by the Data Controller;
- access your personal data and be informed of their origin (if the data were not obtained from you directly), the purposes and aims of the processing, the details of the parties to whom they are communicated, and the storage period of your data or the criteria used to decide it;
- have your personal data updated or rectified to ensure that they are always correct and accurate;
- have your personal data erased from the Data Controller's databases and/or files, including backups, if, amongst other factors, they are no longer necessary for the purposes of the processing or if the processing is seen as unlawful, provided the legal conditions are met; and always provided that the processing is not justified on other, equally legitimate, grounds;
- restrict the processing of your personal data in some circumstances; for example, if you have disputed their accuracy, for the period necessary for the Data Controller to verify their accuracy. You must be also be informed, within an appropriate time, when the suspension period has ended or of the cause why the restriction on the processing has been removed, leading to the revocation of the restriction;
- obtain your personal data, if they have been received or processed by the Data Controller with your consent and/or if they are processed on the basis of a contract and with automated tools, in digital format, also to allow them to be transmitted to another data controller.

The Data Controller must fulfil this request without delay, and in all cases within no more than one month after its receipt. The term may be extended for two months, if necessary, also considering the complexity and number of the requests received by the Data Controller. In these cases, the Data Controller shall notify you and inform you of the reasons for the extension within one month after receipt of your request.

For all further information and to submit requests, please contact the Data Controller at [privacy@greenoleo.com](mailto:privacy@greenoleo.com)

#### **How and when can you object to the processing of your personal data**

For reasons relating to your individual situation, you may object to the processing of your personal data at any time if the objection is based on lawful interest, by sending your request to the Data Controller at the address above.

You are entitled to the erasure of your personal data if there is no lawful reason which prevails over the one on which your request is based.

#### **Who can you complain to**

While retaining all rights to further administrative or legal proceedings, you can submit a complaint to the competent controlling authority, which will be the one which performs its functions and exercises its power where you are resident or work, or in the Member State where the breach of Regulation (EU) 2016/679 occurred, if different.

You will be informed if the Data Controller processes your data for purposes over and above those covered by this policy statement, before such processing begins and in time for you to give your consent if necessary.