

PRIVACY NOTICE FOR APPLICANTS

Pursuant to EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (“GDPR”), the following information is provided pursuant to Art. 13 concerning the processing of your personal data - directly provided by you - in the context of the recruitment relationship.



Data Controller (“Data Controller”) and Data Protection Officer (“DPO”)

The following explains how Engineering Ingegneria Informatica S.p.A. and/or its affiliated, associated and newly acquired companies both in Italy and abroad (“Engineering”) process and protect your personal data that we process and what rights you have in relation to the processing of your personal data when you apply for a job at Engineering (“Application”) or when you undertake pre-employment and/or onboarding actions.

The data controller is the Engineering group company where you have applied (the “Company” or the “Data Controller”). You can find the contact details of that Company in Annex 1 to this Policy.

Engineering Group has designated a Data Protection Officer, (“Data Protection Officer” or “DPO”), who can be contacted at the following email address: dpo.privacy@eng.it.



Which personal data will we process?

The data that the Data Controller may process includes your so-called common data (such as personal or contact details) and your so-called “special” data, subject to the protections of Article 9 GDPR.

Particular data are only those that are likely to reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to identify a natural person uniquely, data relating to a person's health or sexual life or sexual orientation.

We would like to remind you not to include data relating to your health or other data that may fall under the definition of special data in Article 9 GDPR in your CV.

Such data may be requested from you during the selection process only in order to comply with regulatory requirements or to follow up on specific rights or duties of you or the Data Controller in the field of employment law.

The categories of personal data required and the manner in which such personal data is collected and made accessible may vary depending on the country in which the Data Controller is located.

The Data Controller will collect the following categories of data:

- Your name, address, e-mail address, telephone number and other relevant personal information and contact details;
- Your CV, cover letter, previous and/or relevant work experience or other experience, training, transcripts or other information you provide to us in support of the Application;
- Details of the type of job you are or may be seeking, current and/or desired salary and other terms related to compensation and benefits packages, willingness to relocate or other work preferences;
- Details of how you became aware of the position for which you are applying;
- Any information relating to your possible membership of protected categories or further information that may be relevant on the basis of applicable law.
- Information about any previous applications submitted to Engineering and/or any previous work experience with Engineering;

- Your information from publicly available sources, including online that we consider relevant to your application or potential future application (e.g. your LinkedIn profile); and/or
- data provided by employment companies, recruiters or third-party job search websites where applicable;
- data about your health or disability where it is relevant to your ability or willingness to work in a workplace, subject to legal limits on when such data may be collected and other applicable limitations
- gender identity data to help achieve Engineering's diversity objectives, assess the effectiveness of its equal opportunities policy and promote best practices for corporate diversity.



Purpose of the processing and applicable legal basis

The personal data indicated above are processed for the specified purposes. Please note that the processing is lawful only if it is carried out on the basis of a so-called legal basis among those indicated in Art. 6 GDPR.

Below is an indication of the purposes and legal basis for the processing.

- A) To guarantee the correct performance of the Application process aimed at, among other things, assessing the suitability of the applicant for the position for which he/she has applied or for future roles that may become available; managing and responding to your requests for information and enabling the possible fulfilment of pre-contractual and contractual obligations necessary for the establishment of the employment relationship.*

The legal basis for the processing of data sub A is the need to implement pre-contractual measures or measures requested by you pursuant to Art. 6 letter b) GDPR.

In addition, if special data is processed about you (such as if measures requested by you in relation to your specific subjective situation need to be implemented), the processing will be carried out pursuant to Art. 9 letter b) in order to fulfil the obligations and exercise the specific rights of the Data Controller or the data subject in the field of labour and social security law and social protection.

- B) Assess the suitability of the applicant for the position for present and/or future roles that may become available within Engineering. Carrying out statistical analysis and recruiting activities.*

The legal basis for data processing under B is the pursuit of the Data Controller's legitimate interest pursuant to Art. 6 para. 1 letter f GDPR. The Data Controller's legitimate interest is the proper organisation and management of work.

- C) The Data Controller may also process personal data to defend its rights in the course of judicial, administrative or extrajudicial proceedings and in the context of disputes arising in connection with the services.*

The legal basis for data processing under C is the pursuit of the Data Controller's legitimate interest pursuant to Art. 6 para. 1 letter f GDPR. The legitimate interest of the Data Controller is the protection of the company's assets in the event of the emergence of misconduct to the detriment of the employer, also in order to be able to protect its position in court.

- D) Fulfilment of obligations under laws, regulations or EU legislation, or of provisions/requirements of authorities empowered to do so by law and/or supervisory and control bodies.*

The legal basis for the processing of data under D is the need to fulfil legal obligations to which the Data Controller is subject 6 para. 1 letter c GDPR.

In addition, if your special data are processed (such as if you have to implement measures you have requested in connection with illnesses), the processing will be carried out pursuant to Art. 9 letter b) in order to fulfil your or the Data Controller's obligations and exercise your rights in the field of labour and social security law and social protection provided for by law; or pursuant to Art. 9 letter h) if it is provided by law that the employer must have access to your special data for the purpose of preventive or occupational medicine or assessment of capacity for work.

Engineering may also process your personal data for purposes compatible with those listed above.



Sources from which we take your data, Recipients, Modes of processing and retention times

The Data Controller may obtain your data from the following sources:

- From you directly by sending your CV, cover letter or other information entered online;
- By other Engineering affiliates;
- From conversations with recruiters to interviews with hiring managers and other staff or representatives of Engineering, as well as from third parties to whom Engineering outsources recruitment activities, from internet searches these people may perform (where permitted by applicable law), or from data they may obtain from job search or professional networking websites (e.g. LinkedIn, Indeed, Monster, etc.) where your data may be publicly available
- From previous employers;
- From social media (where permitted by applicable law);
- Recipients.

Generally speaking, access to your personal data will be based on the need-to-know principle: a limited number of subjects will have access to your personal data, to the extent strictly necessary to carry out the processing operations identified in this notice.

Furthermore, the Data Controller may communicate your data to third parties who may act under the control and directives of the Data Controller, or as autonomous data controllers. By way of example and without limitation, such recipients may be:

- Service providers (inter alia, IT support functions, recruitment companies, analytics services);
- competent police, judicial and/or administrative authorities, where required;
- professionals, bound by professional secrecy, appointed to take part in the ordinary and contentious management of labour relations;
- companies controlled by or associated with Engineering Ingegneria Informatica S.p.A;
- control/supervisory bodies of the Company;
- business partners for the provision of ancillary services related to the recruiting process.

The complete and up-to-date list of data recipients can be obtained from the Data Controller or the DPO at the above-mentioned addresses.

Processing arrangements

We maintain organisational, physical and technical security arrangements for all personal data in our possession. We have relevant protocols, controls, policies, procedures and guidelines in place to maintain these arrangements, taking into account the risks associated with the categories of personal data and processing we undertake. We take security measures in accordance with the best market standards to protect your personal data.

Retention periods:

The Owner retains the Applicants' data only for as long as necessary to achieve the purposes for which it was collected or for any other related legitimate purpose.

Should a job offer be made and accepted by the Data Controller, the personal data collected during the Application process will become part of Engineering's personnel records, to be kept for the entire period following the termination of the employment relationship with Engineering in accordance with the terms provided for by law. In such circumstances, you will be provided with an information notice on processing personal data in the context of the newly established employment relationship.

Should your Application be unsuccessful, Engineering may nevertheless continue to retain and use the personal data collected during the Application process in order to consider new positions, as well as to carry out market research and analysis, for a maximum of 12 (twelve) months from the end of the Application process.

In any event, the Data Controller reserves the right to retain your data for as long as is necessary to fulfil the regulatory obligations to which it is subject or to meet any defensive needs.



Data Subjects' rights

As a data subject, you are granted the following rights to your personal data collected and processed by the Data Controller for the purposes indicated above.

Right of access

This consists in the right to obtain from the Data Controller confirmation as to whether or not personal data relating to you are being processed and, if so, to obtain access to the personal data and to the following information: (i) the purposes of the processing; (ii) the categories of personal data concerned; (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients in third countries or international organisations; (iv) where possible, the intended retention period for the personal data or, if this is not possible, the criteria used to determine this period; (v) the right to lodge a complaint with a supervisory authority; (vi) where the data are not collected from you, all available information on their origin; (vii) the existence of an automated decision-making process, including profiling, as well as information on the logic used and the envisaged consequences of such processing.

Right of rectification

This consists in the right to obtain the rectification of inaccurate personal data concerning you as well as, taking into account the purposes of the processing, the right to obtain the integration of incomplete personal data, including by providing a supplementary declaration.

Right of erasure

It consists in the right to obtain the deletion of personal data concerning you if one of the following reasons applies: (i) the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; (ii) the data is being processed unlawfully; (iii) you have withdrawn the consent on the basis of which the Data Controller was entitled to process your data and there is no other legal basis for the Data Controller to process it; (iv) you have objected to the processing activity and there is no overriding legitimate reason for the Data Controller to do so; (v) the personal data must be erased in order to comply with a legal obligation. However, you have the right to opt out of the exercise of the aforementioned erasure rights if this is necessary to perform a legal obligation or defend a legal claim.

You are also granted the following rights:

Right to data portability

Consists of the right to receive in a structured, commonly used and readable format your personal data provided to the Company and processed by it on the basis of your consent or a contract with you, as well as the right to transmit such data to another data controller without hindrance;

Right to restriction of processing

This consists of the right to obtain from the Company the restriction of the processing when one of the following cases occurs: (i) in the event that you have contested the accuracy of the personal data concerning you, for the period necessary for the Data Controller to verify the accuracy of such personal data; (ii) in the event of unlawful processing of your personal data, if you object to their deletion (iii) even if your personal data are not necessary for the purposes of the processing, in the event that it is necessary for them to be processed for the establishment, exercise or defence of legal claims; (iv) for the period necessary for the Data Controller to verify whether the legitimate reasons of the Data Controller prevail over your request to object to the processing;

Right to object

Consists of the right to object, on grounds relating to one's particular situation, to the processing of personal data carried out on the basis of the legitimate interest of the Data Controller.

Right to revoke consent

Consists of the right to revoke any consent given. Such revocation shall not affect the lawfulness of the processing based on the consent given before the revocation.

You may ask the Data Controller to exercise your rights at any time by contacting the Data Protection Officer, who can be reached at dpo.privacy@eng.it.

Without prejudice to any other administrative or jurisdictional recourse, you are also guaranteed the right to lodge a complaint with the competent supervisory authority (for Italy: the Garante per la protezione dei dati personali) if Li considers that there has been a violation of your rights regarding the protection of personal data. Further information is available at <http://www.garanteprivacy.it>.



Transfer of data abroad

Insofar as this is instrumental to pursuing the above-mentioned purposes, your personal data may be transferred abroad to companies outside the European Economic Area.

Such countries outside the European Economic Area may have an adequacy decision in which the European Commission has found that the recipient country offers sufficient guarantees in terms of data protection. If the recipient country does not enjoy an adequacy decision, the Data Controller will only proceed with the transfer by taking appropriate measures to ensure the protection of personal data, such as standard contractual clauses or any other mechanism or exception provided for in the GDPR.