

**Privacy notice in compliance with articles 13 and 14 of regulation (EU) 679/2016 – GDPR – RECRUITING DATA (hereinafter also Data Subject /s)**

To offer candidates the best guarantees, ECO POL S.p.A. uses the In-recruiting platform (a solution of Interviewweb Srl, a company of the Zucchetti group - more information on the website <https://www.in-recruiting.com/>), to which the data subject is redirected to send their application. Upon submission of the first application, the platform will send a link to the e-mail address communicated by the candidate, to confirm the data and complete the registration for the service. This will allow the candidate to access the data they have sent and update them at any time, or submit further applications in a simpler and faster way. For this purpose they will be assigned credentials consisting of their e-mail address and a password set by them; in this respect, the candidate is recommended to set a suitably strong password during registration.

**1. WHICH DATA ARE PROCESSED**

- a) data and information provided by the data subject or by subjects delegated or authorized by them (also by filling in personal data sheets, sending curricula, etc.);
- b) data from public registers, lists, deeds or documents knowable by anyone;
- c). data relating to pre-contractual information (curriculum vitae, data that can be freely acquired from public sources and/or provided by subjects in charge of the selection, etc.);
- d) data that originate during any checks and interviews in which the candidate participates and during any assessment of the psycho-physical suitability for the job; (qui una frase manca nell'inglese:) (e.g. subjective assessments by the recruitment officers designed by ECO POL S.p.A. and any certificate of suitability issued by the Company Doctor during the pre-employment phase)

The data mentioned above may include, only if pertinent and necessary in relation to the purposes indicated below, also data relating to criminal convictions and crimes and/or particular categories of data such as: *data communicated by the data subject and data relating to health.*

The data mentioned in item 1 can include, for example, the data collected in reference to diseases, including occupational diseases, disability, infirmity, psycho-physical suitability to perform certain tasks or belonging to protected categories.

**1.1 Why the data can be processed (legal basis of the processing)**

The data indicated above may be processed, always in relation to the purposes indicated below:

- > as necessary for the execution of pre-contractual measures adopted upon request of the data subject;
- > as manifestly made public by the data subject;
- > pursuit of a legitimate interest of the data controller consisting in the protection of assets and in the correctness and effectiveness in the processes of recruitment and verification of the declarations (in particular with reference to the purposes referred to in the following point 3 letters c - d);
- > as coming from public registers accessible to anyone;
- > as necessary to assert or defend a right in court or to assess whether there is a right to be usefully protected in court;
- > having the data subject given his consent, (in particular in relation to the processing of some particular categories of personal data not already contained in the curricula spontaneously sent by the candidate and for the purposes referred to in point 3 letter b below );

**2. DATA SOURCE**

The data referred to in item 1:

- > come from the data subject, also through third parties acting on their behalf or authorized by them (e.g.: family members, recruitment agencies, schools/training institutions, associations, etc.);
- > are acquired from sources freely accessible to anyone (public registers, lists, deeds or documents knowable by anyone, etc.);
- > originate during any interviews in which the candidate participates and during any assessment of the psycho-physical suitability to the job such as: results of psycho-aptitude tests, always limited to what is necessary to the insertion into the specific working context, or certificates of suitability issued in the pre-employment phase by the Company Doctor and subjective assessments of the recruitment staff;

**3. WHY THE DATA ARE PROCESSED - Purpose of the processing**

The processing of the personal data has the following purposes:

- a. Evaluation of the candidate for the purpose of a possible job assignment, even if not in an employee work relationship;
- b. Storage for possible future use, even if not in an employee work relationship (e.g.: project contracts, etc.) also by associated and/or controlled companies;
- c. Check completeness of the data reported by the candidate; in this regard, it is specified that the completeness of the data needed for a correct evaluation of the candidate is an essential requirement to participate in the selection;
- d. Integrate the information provided by the data subject by drawing from public registers, lists, deeds or documents knowable by anyone, also available on the web/internet by verifying its reliability, credibility and plausibility, all of this always in reference to the professional aptitude of the candidate and to characteristics/data that affect the methods of carrying out the working activity or which constitute an essential and decisive requirement for the purpose of carrying out the job/assignment for which the candidate is evaluated;

**4. HOW THE DATA ARE PROCESSED and storage times**

In relation to the abovementioned purposes, the processing of personal data may take place with paper, digital and telematic tools and will include all the operations or set of operations necessary for the data processing, including communications in the areas referred to in this document and any verifications of the accuracy of the data also carried out at the subjects indicated by the data subject on their curriculum vitae; all this, guaranteeing the most absolute confidentiality, relevance and non-excess with respect to the activities described above.

For some tasks that require particular attention, the candidate may be required to participate in specific psycho-aptitude tests provided by third parties which will act as autonomous data controllers.

Even if the candidate is not immediately selected, the above data will be kept, always for recruitment purposes, for a time period not exceeding 24 months following the last contact with the data subject, bearing in mind that after 12 months could be used only the name, contact details and general indication of the position of interest will be used for the purpose of requesting the data subject to update the data and confirm their availability.

## 5. WHO CAN PROCESS THE DATA

For the same purposes, the data may be processed by the following categories of appointees and/or managers:

- Human Resources staff of ECOPOP SpA;
- Managers and coordinators of the Management/Function/Office/Operating Unit concerned with the candidate's profile;
- Resources (internal and external) who are delegated to manage and maintain IT systems;
- Companies/consultants in charge of carrying out recruitment or verification activities on behalf of ECOPOP S.p.A.

## 6. TO WHOM THE DATA MAY BE COMMUNICATED/DISCLOSED

The personal data relating to the treatment in question may be communicated:

- to associated companies also located outside the EU (listed on the website <https://www.ecopol.com/>), if and as far as they are interested in the candidate's profile or involved in the recruitment process;
- to Companies/consultants involved in the verification and recruitment activities who will act as independent data controllers;

Naturally, the communications described above are limited only to the data necessary for the recipient Entity to carry out its tasks and/or to achieve the purposes connected to the communication itself, always attributable to what is reported in point 3 above.

### 6.1 Sharing Personal Data Abroad

The sharing of resources and activities with associated companies also located outside the EU (listed on the site [https://www.ecopol.com.](https://www.ecopol.com/) ) may involve a transfer of data to these companies, if and as far as they are interested in the candidate's profile or involved in the recruitment process.

In this regard, please note that all associated Companies that should receive the data adopt the same privacy management system and the same protection measures in force in ECOPOP S.p.A; to guarantee data subjects full protection, the relations with these Companies will be governed by signing the standard contractual clauses indicated at European level (Implementing Decision by the Commission (EU) 2021/914 of 4 June 2021).

### 6.2 DISSEMINATION

The data will not be disseminated.

## 7. WHEN IT IS MANDATORY TO COMMUNICATE ONE'S DATA

The communication and updating of one's personal data are obviously optional, as is the provision of any consents that may be requested.

## 8. WHO IS THE DATA CONTROLLER AND RIGHTS OF THE DATA SUBJECT

The Data Controller in question is **ECOPOL S.p.A** – Polo Industriale Sergio Marchionne n.1 – 51013 Chiesina Uzzanese (Pistoia) – Tel. +39 0572 286000

## 9. RIGHTS OF THE DATA SUBJECT

The data subject has the right:

- > to ask the data controller to access their personal data and correct or cancel them or limit the processing of personal data concerning them and to oppose their treatment;
- > if the treatment is carried out by automated means (digital system) and on the basis of one's consent, to receive the personal data concerning them in a structured format, of common use and readable by an automatic device and/or to obtain direct transmission to another data controller, if technically possible;
- > to revoke their consent at any time (without prejudice to the lawfulness of the treatment based on the consent before the revocation);
- > to lodge a complaint to the Italian Supervisory Authority: Garante per la protezione dei dati personali - Piazza Venezia n. 11 00187 ROME - Telephone switchboard: (+39) 06.696771 - E-mail: [garante@gpdp.it](mailto:garante@gpdp.it) - certified mail [protocol@pec.gpdp.it](mailto:protocol@pec.gpdp.it).

To enforce their rights, the data subject can contact the Data Controller by the contact details indicated above or by writing to [privacy@ecopol.com](mailto:privacy@ecopol.com) bearing in mind that personal data cannot be communicated by telephone when there is no certainty about the identity of the interlocutor and that also in other cases the data subject must be identified with certainty.

**Finally**, the Candidate is invited to periodically update their data bearing in mind that:

- > ECOPOP S.p.A CANNOT take into consideration, for recruitment purposes, any curricula that have not been updated for more than 12 months and which, as mentioned above, after this deadline, only the name, the contact details and a generic indication of the position of interest will be used for the purpose of requesting from the data subject a possible update of the data and a confirmation of their availability;
- > in any case, after 24 months from the last update, the candidate's data may be deleted from the ECOPOP S.p.A. databases.

**The Candidate shall only communicate information of which they have full availability, having received the necessary authorizations from the subjects they refer to.**