

**INFORMATION ON PROCESSING A CANDIDATE'S PERSONAL DATA**  
pursuant to article 13 of EU Regulation 679/2016 (the "GDPR")  
**Version 24/07/2019**

**THE CONTROLLER**

Noe 24 S.r.l (the "Controller" or "Noe 24")  
VAT NO. 10437260960  
via Vittor Pisani 20 -20124- Milan, Italy

**THE SOURCE OF DATA COLLECTION**

Data provided voluntarily by sending your *curriculum vitae* as an "application", either through the Controller's physical or digital contact channels (including its website [www.21wol.it](http://www.21wol.it)), or collected when responding, again as an application, to a job opening/posting/announcement published, both through physical and digital channels, by the Controller or by third parties specifically appointed and/or duly authorised by the Controller.

**1 THE PERSONAL DATA PROCESSED**

• **PERSONAL DATA**

first name, last name, date of birth, place of birth, gender, tax code

• **CONTACT DETAILS**

email address, telephone number, home/domicile address, current and former professional addresses, Skype ID

• **CAREER DATA**

educational qualifications, career path, skills, certifications, driving licences, salary data

• **SPECIAL CATEGORIES OF DATA**

depending on the nature of the position for which you are applying, we may have to process special categories of data, known as "Sensitive Data" e.g. data revealing information on your psychological-physical suitability for certain jobs, on handicaps or disabling pathologies, on allergies or belonging to certain protected categories, as well as membership and any roles held in trade unions and associations, including philanthropic ones, any institutional positions held, whether elective or not

• **JUDICIAL DATA - CRIMINAL RECORD CERTIFICATE**

depending on the nature of the position for which you are applying, we may have to ask you to produce a criminal record certificate, certifying the presence/absence of criminal proceedings or convictions that might lead to your exclusion from the selection process for the position in question

• **PROFESSIONAL AND/OR ACADEMIC REFERENCES**

sent with the application or collected later

• **OTHER INFORMATION GATHERED DURING THE INTERVIEW**

**1.1 THE PURPOSES FOR WHICH PERSONAL DATA IS PROCESSED**

**To select personnel**

The search, selection, and assessment of personnel, including for the benefit of other companies in the Noe 24 Group, through unsolicited applications or through applications submitted following a job opening/posting/announcement being published, both through physical and digital channels, by the Controller or by third parties specifically appointed for this purpose by the Controller;

**To comply with legal obligations.**

[Compliance with Italian Legislative Decree no. 231/2001 on the administrative liability of legal persons and entities;] Fulfilment of obligations and the exercising of rights by the Controller or the Data Subject with regard to labour law or, in any case, within the scope of labour relations, within the limits established by laws, regulations and collective agreements, including at the time of hiring

**1.2 THE LEGAL BASIS FOR PROCESSING PERSONAL DATA**

The data is necessary to execute pre-contractual obligations to which you are party in connection with your application, i.e. in connection with your possible future professional relationship with the Controller (article 6(1)(b) of the GDPR). If you send any Sensitive Data to us with your application, the legal basis for which we may process such data is the need to fulfil the obligations and exercise the specific rights of the Controller or the Data Subject in the field of employment and social security and social protection law (article 9(2)(b) of the GDPR). In any case, Sensitive Data will be processed exclusively for the purpose of processing your application and only if this is necessary and indispensable.

If you provided us with references in your application, we may, with your consent, check your academic and/or professional backgrounds with the contact person(s) indicated. You are entitled to withdraw your consent to the processing of such data at any time, without prejudice to the lawfulness of the processing carried out to date.

The fulfilment by the Controller of a legal obligation to which the Controller is subject (article 6(1)(c) of the GDPR) and article 9(2)(b) and article 88 of the GDPR.

**WHETHER PROVIDING SUCH DATA IS COMPULSORY OR OPTIONAL**

Optional.

In the event that you decide not to provide this data, or the data you provide is incomplete/incorrect, Noe 24 will not be able to process your application and/or your application may be jeopardised.

**PROCESSING PERIOD AND STORAGE PERIOD OF PERSONAL DATA**

Data will be processed and stored for the period of time strictly necessary to achieve the purposes relating to the selection of personnel and, in any case, will not be stored for a period greater than 1 year from the date on which the data was provided or for a period of 5 years from the date on which the data was provided for the sole purpose of making a legal defence.

Processing any of the data referred to in this Table, including Sensitive Data, for profiling purposes is excluded.

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**2 - METHODS BY WHICH DATA IS PROCESSED - PERSONS AUTHORISED TO PROCESS PERSONAL DATA - POSSIBLE RECIPIENTS OF PERSONAL DATA**

Your personal data will be processed manually or automatically, in both digital and paper form, by parties authorised to do so and employed within Noe 24's corporate organisation, including its HR and IT departments, in compliance with all applicable regulations and in such a way as to guarantee the security and confidentiality of the data.

Your personal data will not be disclosed and shall only be known by the following parties in relation to the purposes for which data is processed, as set out above:

- Parties who can access the data by virtue of legal provisions laid down by European Union law or by the law in a Member State to which the Controller is subject;
  - Companies in the Noe 24 Group in the event that your application is addressed to one of them;
  - Parties who perform purposes and provide services for the Controller, in their capacity as Processors of personal data, duly appointed for this purpose by Noe 24, which are ancillary to the activities and services referred to in Table 1, above, (e.g. suppliers of maintenance and development services for the Controller's information systems);
  - Outsourcing service providers and/or external consultants trusted by the Controller who provide personnel search and selection services in relation to the purposes set out in Table 1, above, which, specifically and as appropriate, may act as Processors of personal data, duly appointed by Noe 24, or as autonomous Controllers.
- The list of recipients of personal data is available at Noe 24's headquarters and may also be obtained by emailing [privacy@21wol.it](mailto:privacy@21wol.it);

**3 - TRANSFERRING PERSONAL DATA TO THIRD COUNTRIES**

Personal data is processed exclusively in the European Union.

Should there be a need to transfer personal data to a third country, the Controller undertakes to:

- ensure that the country to which the personal data will be sent guarantees an adequate level of protection, as required by article 45 of the GDPR; or • use the standard data protection contractual clauses approved by the European Commission for transferring personal data outside the EEA (these are the clauses approved under article 46(2) of the GDPR); or
- make sure, where personal data is transferred to the United States, that the third party is registered with the Privacy Shield.

**4 - YOUR RIGHTS AS A DATA SUBJECT - COMPLAINING TO A SUPERVISORY AUTHORITY**

In relation to the aforementioned processing of personal data, you may exercise the following rights, at any time, by emailing [privacy@21wol.it](mailto:privacy@21wol.it) or by sending a registered letter with return receipt to Noe 24's headquarters, under the conditions and within the limits laid out by articles 12 and 13 of the GDPR:

- Right of access (article 15 of the GDPR);
- Right to rectify inaccurate data and to supplement incomplete data (article 16 of the GDPR);
- Right to erase personal data (article 17 of the GDPR);
- Right to restrict processing of personal data (article 18 of the GDPR);
- Where processing is based on consent or on a contract and is done by automated means, the right to receive your personal data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit this personal data to another controller without hindrance pursuant to article 20 of the GDPR;
- Right to object to processing carried out in accordance with article 6(1)e) or f) of the GDPR (article 21 of the GDPR);
- With specific reference to Sensitive Data and data about references, you have the right to revoke, at any time, your consent to the processing of such data and to have this data deleted, unless it needs to be retained in order to comply with legal and/or regulatory obligations.

You also have the right to lodge a complaint with a Supervisory Authority - in Italy, this is the Italian Data Protection Authority (*Garante Italiano per la Protezione dei Dati Personali*) - and/or with any other competent control authority (article 77 of the GDPR).

I have read and understood the information on how Noe 24 will process my personal data to manage my application for employment at Noe 24 or a company in the same Group.

**I give my express consent to the processing of my personal data in relation to any professional and/or academic references contained in my application - as indicated in the information received - if they are needed to carry out the relevant checks with the contact persons indicated.**

Yes  No