

**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES
ARTICLES 13 and 14 OF REGULATION (EU) 2016/679 ("GDPR")**

1. CONTACT DETAILS OF THE DATA CONTROLLER AND OF THE DATA PROTECTION OFFICER

DATA CONTROLLER (the "Company" or the "Controller")	W EXECUTIVE S.R.L. Registered office: corso Venezia 48, 20121 Milano VAT No.: 04310290988 Tax Code: 04310290988 privacy@wexecutive.eu info@pec.w-executive.it
DATA PROTECTION OFFICER (DPO)	EUCS S.r.l.s. Unipersonale VAT No.: 04709650289 Telephone: 049-8764539 e- mail: info@eucs.it Certified e-mail: info@pec.eucs.it

2. CATEGORIES OF DATA BEING PROCESSED AND DATA SOURCES

- 2.1 The data being processed are identification data, including, but not limited to, first name, surname, place and date of birth, tax code, nationality, address, sex, landline and mobile telephone numbers and e-mail address and images; data concerning your educational background and career path such as qualifications, work experience and any other data you may have included in your CV and/or in the online questionnaire you have completed.
- 2.2 Please be informed that the Company may process "special categories of personal data" pursuant to Article 9 of the GDPR, including any data revealing your state of health or your belonging to protected categories possibly included in your CV or in any further documentation you have submitted to the Company, whenever this is necessary for recruiting services related to the targeted employment request, subject to your consent. Besides, the Controller may process your judicial data only in cases where such processing is provided for by law and, in any case, in accordance with applicable requirements.
- 2.3 The above data may be collected directly from you as data subject and/or from third parties in relation to your previous working experience (only subject to your consent) and/or from publicly accessible sources, including, but not limited to, your job profile published on social networks (within the limits provided for in this privacy notice).

3. PURPOSES AND LEGAL BASIS OF THE PROCESSING AND DATA STORAGE PERIOD

WHY DO WE PROCESS YOUR DATA?	WHAT ARE THE CONDITIONS FOR LAWFUL PROCESSING?	HOW LONG DO WE KEEP YOUR PERSONAL DATA?
For purposes related to the administration of your application to a job offer and/or of an unsolicited	Performance of steps prior to entering the contract or during the performance of the contract (point (b) of Art. 6(1) of GDPR).	For 48 months starting from when you replied to our job announcement or you submitted your CV or last updated it, if during this time no changes and/or updates have been

application not related to a specific job announcement.		made either by you or by the staff of W Executive S.r.l., provided that such modification and/or update is carried out following a discussion with you.
Any personal data you will provide with reference to special categories of personal data pursuant to Article 9 of the GDPR will be only processed when necessary or relevant in order to evaluate your application for a job position related to the targeted employment request.	The need to solve them obligations and exercise rights specific to the owner of the treatment or of the interested party in matters of labor law and social security e social protection, in extent to which it is authorised by Union or European law Member States or by a contract collective under the law of the Member States, in presence of appropriate guarantees for fundamental rights and interests of the interested party (art. 9.2 lett. bRGPD).	
To ascertain, exercise or defend the Controller's rights in and/or out of court.	Legitimate interests of the Company to protect and defend its rights in the appropriate fora (point (f) of Art. 6(1) of GDPR).	For the entire duration of the dispute, until the time limits for bringing an appeal have expired.
We may process publicly available information and/or information published on the Internet concerning your job profile in order to verify that the data you have provided correspond to what you have stated.	Legitimate interests of the Company to verify the correspondence and truthfulness of the information you have provided (point (f) of Art. 6(1) of GDPR).	For 48 months starting from when you replied to our job announcement or you submitted your CV or last updated it, if during this time no changes and/or updates have been made either by you or by the staff of W Executive S.r.l., provided that such modification and/or update is carried out following a discussion with you.
To collect professional references from your previous employers and - if necessary - to disclose them to the company that has entrusted us with the relevant selection and/or training project.	The data subject has given consent (point (a) of Art. 6(1). of GDPR).	
To allow you to receive other services, your data may be disclosed to Companies belonging to W Group Holding S.p.a. of	The data subject has given consent (point (a) of Art. 6(1). of GDPR).	For the period of time for which the data are retained by the Company depending, from time to time, on the purposes of the processing concerned as indicated above.

<p>which W Executive S.r.l. is part.</p>		<p>For the retention period relating to services provided by other group companies, please refer to the privacy policy of each group company, as provided from time to time.</p>
<p>After the above-mentioned retention periods have elapsed, all data stored in databanks will be deleted or rendered anonymous and paper media will be destroyed.</p>		

4. MANDATORY PROVISION OF DATA AND MANNER OF PROCESSING

- 4.1 The provision of data related to the administration of your application for manpower research and selection purposes is compulsory (except for personal data for which specific consent is required as set out under point 3) above. Refusal to provide such data will prevent processing and the Company will not be in a position to provide any services.
- 4.2 The processing of your personal data is carried out by manual, paper-based, computer-based, telematic or automated means, also suitable for storing, managing or transmitting the data, in any case suitable for guaranteeing the security and confidentiality of the data, according to criteria strictly related to the purposes set out in this privacy notice. The processing of personal data is performed lawfully, fairly and in a transparent manner, according to the inspiring principles of the GDPR.

5. CATEGORIES OF DATA RECIPIENTS

- 5.1 The data may be disclosed to entities acting as autonomous data controllers, including, but not limited to, the companies belonging to W Group Holding S.p.a., the Company's customers, public bodies, etc., subject to your prior explicit consent, or to fulfil pre-contractual and contractual legal obligations.
- 5.2 Your personal data may be processed, on behalf of the Company, by other subjects appointed as Processors or in charge of processing activities.

6. LOCALISATION AND TRANSFER OF DATA

- 6.1 For personal data processing, W Executive S.r.l. makes use of an IT infrastructure located in the European Union.
- 6.2 In case of reliance on suppliers based outside the European Union, we will check in advance that they have consistent security measures in place and that they fulfil the guarantees provided for by the GDPR.

7. RIGHTS OF DATA SUBJECTS

- 7.1 You have the right to request to the Controller access to and rectification or erasure of personal data concerning yourself, the right to have incomplete personal data completed, the right to restriction of processing in the cases provided for by Article 18 of the GDPR; the right to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit those data to another controller without hindrance if the conditions for exercising the right to portability pursuant to Article 20 of the GDPR are met (the processing is based on consent pursuant to point (a) of Article 6.1 or point (a) of Article 9.2 of the GDPR or on a contract pursuant to point (b) of C and is carried out by automated means).
- 7.2 You have the right to object to processing on grounds relating to your particular situation, for the pursuit of purposes based on the legitimate interests of the Company.

- 7.3 You have the right to withdraw the consent you have given at any time, without affecting the lawfulness of the processing carried out up to that moment.
- 7.4 You may exercise the above rights by writing to privacy@wexecutive.eu, or you may contact the DPO - EUCS S.r.l.s. Unipersonale at the contact details provided above.
- 7.5 Data subjects who consider that the processing of personal data relating to them conducted by the Controller infringes the provisions of the GDPR have the right to lodge a complaint with the Data Protection Supervisory Authority (Article 77 of the GDPR) or to take legal action (Article 77 of the GDPR).

8. PARTIALLY AUTOMATED DECISION-MAKING PROCESSES

- 8.1 We inform you that, during the selection process, the Company may have recourse to partially automated processing means (including for data collection) and algorithms (typically calculation factors and statistical processes) that can potentially affect your legal position or generally influence our research and selection process methods.
- 8.2 The legal basis for such processing pursuant to the combined provisions of point (b) of Article 6(1) and point (a) of Article 22(2) of GDPR is the fulfilment of contractual/pre-contractual obligations.
- 8.3 In particular, during the research and selection process, we may use a software application to analyse the content of your application to our job announcement and verify if it satisfies the position requirements, giving a score to your application based on how well it matches the targeted job profile. The use of that application does not involve any decision-making entirely based on automated means, but simply aims to support recruiters in their decision-making process. Recruiters shall always be the sole decision-makers and ultimately responsible for the screening and selection process outcome. The Controller has implemented suitable measures to safeguard the data subject's rights and freedoms and legitimate interests.
Without prejudice to the rights granted to you as mentioned in this privacy notice, at any time you may ask the Controller, by writing to privacy@wexecutive.eu:
 - for information about the mechanisms underlying the automation process;
 - for information about the periodic assessments put in place to verify the reliability of the automated means used;
 - to express your point of view and/or to contest the decision.
- 8.4 In any case, if the processing is based on automated decision-making, data subjects will be provided a specific privacy policy.

DECLARATION OF ACKNOWLEDGEMENT OF THE PRIVACY NOTICE

I declare that I have received and read the privacy notice on the processing of my personal data.

Place: _____ Date: __/__/____

Legible name and surname: _____ Signature: _____

DECLARATION OF CONSENT TO THE COLLECTION OF PROFESSIONAL REFERENCES FROM PREVIOUS EMPLOYERS

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, I hereby express my consent to the processing of my personal data to enable the Company to collect professional references from my previous employers and - if necessary - to disclose them to the company for which the recruitment is being conducted:

- I give my consent
- I refuse consent

DECLARATION OF CONSENT TO THE DISCLOSURE OF PERSONAL DATA TO COMPANIES BELONGING TO W-GROUP HOLDING S.P.A.

I declare that I have read the information on the processing of personal data provided by W Executive S.r.l. and, being aware that my consent is optional and that I have the right to withdraw it at any time, as regards the disclosure of my personal data to other companies belonging to W Group Holding S.r.l.:

- I give my consent
- I refuse consent