

# SOCIAL NETWORK RECRUITMENT PRIVACY POLICY



V. 1.00


**ALMECO S.p.A.**


Privacy & IT SECURITY: All our experience at your service!








**SOCIAL NETWORK RECRUITMENT PRIVACY POLICY  
AS PER ARTICLES 13 AND 14, RECITALS 60-62, GDPR**

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|  | <p><b>DATA CONTROLLER</b></p>               | <p><b>ALMECO S.P.A.</b><br/>                 Address: Via della Liberazione,15 – 20098 Civesio, San Giuliano Milanese (MI)<br/>                 Telephone: +39 02 9889631<br/>                 Fax: +39 02 98896399<br/>                 Email: <a href="mailto:info.it@almecogroup.com">info.it@almecogroup.com</a><br/>                 PEC certified email: <a href="mailto:almeco@registerpec.it">almeco@registerpec.it</a><br/>                 VAT no. and tax code and ITVAT: 00772590154<br/>                 Share capital: €30,000,000 fully-paid<br/>                 Economic and Administrative Index (REA): 687991<br/>                 Milan Chamber of Commerce<br/> <a href="http://www.almecogroup.com/it">www.almecogroup.com/it</a></p> <p><u>Sector and activity:</u></p> <ul style="list-style-type: none"> <li>• A world leader in the production of aluminium components and laminates for the architectural, lighting, solar and decorative sectors.</li> </ul> |
|  | <p><b>DATA PROTECTION OFFICER (DPO)</b></p> | <p><b>MICROELL Srl (contact Francesco Traficante)</b><br/>                 Via Mazzini 19b, 21052 Busto Arsizio (VA)<br/>                 Email: <a href="mailto:dpo@almecogroup.com">dpo@almecogroup.com</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|  | <p><b>PRINCIPLES</b></p> <p>One of our fundamental objectives is the protection of personal data. The data are processed in a lawful, proper and transparent manner, adequate, relevant and limited to what is necessary, accurate and, if necessary, updated, collected for specific, explicit and legitimate purposes pursuant to articles 5 and 6 of Regulation (EU) 2016/679 on Data Protection and in accordance with the Provision containing the prescriptions concerning the processing of special categories of data, pursuant to Art. 21, para. 1 of Italian Legislative Decree 101/18 issued by the Privacy Authority no. 146 on 5 June 2019. The data are processed in such a way as to ensure their adequate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage (integrity and confidentiality) through appropriate technical and organisational measures.</p> <p>The personal data collected and any special data communicated to us or otherwise acquired shall be processed solely for the purposes of recruitment, profile assessment and, if necessary, selection and hiring of personnel. In any case the Data Controller shall only use data that are strictly pertinent and limited to what is necessary for the selection of personnel, also taking into account the particular tasks and/or specificity of the professional profile required.</p> <p><u>Rules and suggestions for the submission of CVs:</u></p> <ol style="list-style-type: none"> <li>Submit the CV in PDF format.</li> <li>Avoid providing special data (even if only capable of revealing racial/ethnic origin, political thought and/or trade union membership, religious belief, state of health, sexual life) and data concerning family members if not relevant in connection with the job offer and/or if not strictly necessary.</li> </ol> <p>The Data Subject shall be notified in the event of substantial changes to this Privacy Policy and the related data processing, providing the option to authorise us or otherwise to process the data for the purposes set out below.</p> |
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|  | <p><b>SOURCES OF PERSONAL DATA</b></p> <p><b>Collected from the Data Subject:</b></p> <ul style="list-style-type: none"> <li>• Data Controller's social page.</li> </ul> <p><b>NOT collected from the Data Subject:</b></p> <ul style="list-style-type: none"> <li>• Private Databases (parties performing professional personnel search and selection services, etc.);</li> <li>• Public Databases (Lists of Members of Orders or Registers, Employment Offices, Other Lists, etc.);</li> <li>• Social Networks, internet and search engines.</li> </ul> |
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|  | <b>CATEGORIES OF DATA SUBJECTS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                   |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                      |
|                                                                                   | <ul style="list-style-type: none"> <li>• <b>Voluntary applications</b> (unsolicited CVs).</li> <li>• <b>Candidates</b> (individuals who potentially present objective and subjective professional characteristics that meet the requirements of a personnel search and selection process).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                   |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                      |
|  | <b>CATEGORIES OF PERSONAL DATA PROCESSED</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                   |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                      |
|                                                                                   | <ul style="list-style-type: none"> <li>• <b>Common:</b> identification and contact details and other information contained in the curriculum vitae;</li> <li>• <b>Particular:</b> data potentially capable of revealing sensitive information, e.g. racial origin, political orientation and/or trade union membership, religious belief, health status, membership in protected categories, information on family members, etc.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                   |                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                      |
|   | <b>PURPOSES OF THE PROCESSING</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | <b>DESCRIPTION OF THE PURPOSES AND LEGAL BASIS FOR THE PROCESSING</b> |                                                                                                                                                                                                                                                                                                                                                                                        | <b>DURATION OF THE PROCESSING AND STORAGE PERIOD</b> |
| 1. Recruitment.                                                                   | <p><b>Purposes related to personnel search and selection.</b></p> <p><b>Voluntary applications:</b></p> <ul style="list-style-type: none"> <li>• storage of potentially useful profiles for possible future recruitment and selection.</li> </ul> <p><b>Candidates:</b></p> <ul style="list-style-type: none"> <li>• processing and possible communication to authorised persons involved in the processing, only if necessary;</li> </ul> <p><b>Legal Basis for Processing:</b></p> <ul style="list-style-type: none"> <li>• Execution of pre-contractual measures.</li> <li>• With regard to the processing of data belonging to special categories of personal data for the purposes referred to in point <i>a)</i> above and strictly relevant and limited to what is necessary for the current personnel selection, the legal basis for the processing is Article 9, para. 2 of Regulation EU 2016/679, Art. 111 bis of the Privacy Code and the Provision containing the prescriptions relating to the processing of special categories of data pursuant to Art. 21, para. 1 of Italian Legislative Decree 101/18 issued by the Privacy Authority as no. 146 on 5 June 2019.</li> </ul> |                                                                                   |                                                                       | <ul style="list-style-type: none"> <li>• For a period strictly necessary until the next personnel search and selection procedure, and retention up to a maximum of 24 months.</li> <li>• For a period strictly necessary for the proper, complete management of the personnel search and selection procedure. Possible retention at the Data Controller's discretion until the next personnel search and selection procedure and up to a maximum of 24 months.</li> </ul> |                                                      |
| 2. Legal obligations.                                                             | <p><b>Fulfilment of precise obligations envisaged by regulations and applicable European and national laws:</b></p> <ul style="list-style-type: none"> <li>• verification of the requirements of good repute, integrity, professionalism and independence limited to persons holding specific positions of responsibility: (anti-money laundering, fraud, identity theft and impersonation, anti-terrorism, etc.).</li> </ul> <p><b>Legal Basis for Processing:</b></p> <ul style="list-style-type: none"> <li>• Compliance with legal obligations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                   |                                                                       | <ul style="list-style-type: none"> <li>• Duration and Retention dictated by legal requirements.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                |                                                      |
| 3. Defensive rights.                                                              | <p><b>Assessment, exercise or defence of the rights of the Data Controller, where necessary, both in and out of court.</b></p> <p><b>Legal Basis for Processing:</b></p> <ul style="list-style-type: none"> <li>• Legitimate Interest of the Data Controller.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                   |                                                                       | <ul style="list-style-type: none"> <li>• Duration of the in- or out-of-court dispute until the claims are time-barred and Preservation dictated by legal requirements.</li> </ul>                                                                                                                                                                                                                                                                                         |                                                      |



## METHOD OF CONTACT

### Traditional:

- Telephone;
- Standard mail.

### Automated:

- Text message;
- Email;
- Video call or other web meeting systems;
- Chat or messaging systems (WhatsApp and other comparable instant messaging solutions);
- Data collection form in the Data Controller's Social Pages;
- Personnel search ads via specific web portals.



## RECIPIENTS OF THE DATA

The data are processed by Social Media Providers and their Partners who operate as joint Data Controllers for the pursuit of their own purposes as set out in their respective [general terms and conditions of use](#) and [privacy policies](#).

The data may be disclosed and processed by external parties acting as data controllers such as, by way of example:

### Italy:

- Authorities and supervisory and control authorities;
- Judicial authority and Police;
- General public bodies, INPS, INAIL, Territorial Labour Inspectorate;
- ASL, Occupational Medicine and health profession organisations;
- Employment services, training institutions and professional certification;
- Professional and interprofessional funds;
- Insurance companies, private or public funds for welfare and assistance;
- Law firms;
- Parties that offer professional consulting services, including in associated form;
- Parties performing professional personnel search and selection services.

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The data may also be processed on behalf of the Company by external parties designated as data processors, to which appropriate operating instructions are given. These parties are essentially included in the following categories:

### Italy:

- Parties performing professional personnel search and selection services;
- Parties that offer professional consulting services, including in service companies or in associated form;
- Parties performing controls, audits and certifications;
- Parties that offer IT, ICT, cloud, web and digital marketing services;
- Parties that offer paper, digital and alternative storage services;
- Parties that offer traditional and automated postal services;
- Parties that offer ICT services (Hosting/Data Centre);



## OBLIGATORY NATURE OF THE PROVISION OF DATA

For the personnel search and selection procedure, the provision of Data and their processing, including Special Data where necessary for the selection of personnel, is compulsory as it is a requirement, therefore the failure to provide data or the provision of partial or inexact data will make it impossible to carry out the recruitment process.

## PARTIES AUTHORISED TO PROCESS THE DATA



The data may be processed by employees and workers of the business functions, herein including subjects receiving communications, assigned to carry out the above purposes, who have been expressly authorised to process the data, who have received appropriate operating instructions, and who have been adequately informed and trained.



#### **TRANSFER OF THE PERSONAL DATA TO NON-EU COUNTRIES**

We do not directly transfer data abroad. The data may be transferred to non-EU countries by the owners of social platforms and/or search engines and their Partners.

A copy of the data can be obtained in the manner outlined in the section "RIGHTS OF THE DATA SUBJECT – LODGING COMPLAINTS WITH THE SUPERVISORY AUTHORITY" below.



#### **RIGHTS OF THE DATA SUBJECT – LODGING COMPLAINTS WITH THE SUPERVISORY AUTHORITY**

We and social media Providers process personal data as Joint Data Controllers. This Privacy Policy discloses and governs the processing carried out under our direct responsibility. To understand how the Social Network operates and processes under its direct responsibility, including how to exercise one's rights: [general terms and conditions of use](#) and [privacy policy](#).

By contacting the DPO by email at [privacy@almecogroup.com](mailto:privacy@almecogroup.com), Data Subjects may ask the Data Controller to give them access to their data, block their data, correct inaccurate data, complete incomplete data, restrict processing in the cases envisaged by article 18 of the GDPR, as well as object to processing in the case of the legitimate interest of the Data Controller.

The data controller shall provide the data subject with the information relating to the request for the exercise of the data subject's rights (pursuant to articles 15 to 22 of the GDPR) without undue delay, and in any event at the latest within one month of receiving the request, as envisaged in article 12 of the GDPR.

Furthermore, in the event that the processing is based on consent or a contract and is performed with automated tools, the data subjects have the right to receive the data in a structured, commonly used and machine-readable format, and, if technically feasible, to have them sent to another data controller without impediment (Right to Portability), and to request the simultaneous or subsequent definitive cancellation of such data (Right to Be Forgotten).

If the processing is based on consent for one or more purposes (art. 6, paragraph 1, letter A of the GDPR) and for the processing of particular data (art. 9, paragraph 2, letter A of the GDPR), the withdrawal of consent at any time does not affect the legality of the processing based on consent before such withdrawal.

Data subjects shall have the right to lodge a complaint with the Supervisory Authority having jurisdiction in the Member State of their habitual residence, place of work or place of the alleged infringement.



#### **DECLARATION OF CONSENT OF THE DATA SUBJECT**

Having read the Privacy Policy, submitting your application and CV constitutes authorisation to process the personal data provided to the Data Controller.