

PERSONAL DATA PROCESSING INFORMATION
JOIN OUR TEAM – RECRUITMENT PRIVACY POLICY

Under Articles 12, 13 and 14 of the EU Regulation 2016/679 ("GDPR" or the "Regulation"), and in general in compliance with the principle of transparency set out in the Regulation, we are hereby providing the following information regarding the processing of personal data (i.e. any information concerning an identified or identifiable natural person: "Data Subject") concerning personnel recruitment and selection activity carried out by the Data Controller. To this end, we specify that the personal data may be collected from the data subject under art. 13 of the GDPR as well as art. 14 of the GDPR, obtained from employment agencies contractually linked to the Data Controller.

1. DATA CONTROLLER

The Data Controller (i.e. the entity who determines the purposes and the means of personal data processing, "Data Controller" or "Controller") is **BLM GROUP** (Adige S.p.A., with registered office in Levico Terme (TN), via per Barco 11, VAT number 01429670225 – Adige-Sys S.p.A., with registered office in Levico Terme (TN), viale Venezia 84/B, VAT number 01713040226 - BLM S.p.A., with registered office in Cantù (CO), via Selvaregina 30, VAT number 01653120137, BGS S.r.l., with registered office in Piacenza, Via I Maggio No. 26 and VAT number 01356980332 and INTEC S.r.l. with registered office in Figino Serenza (CO), Via Grigna, 24, VAT number 00787380138). Please use the following e-mail address for contacts specifically related to the protection of personal data, including the exercise of the rights set out in § 8 below, and for queries: privacy@blmgroup.it.

2. TYPE OF PERSONAL DATA TO BE PROCESSED

The following data categories may be subject to processing:

- a) Personal data such as name and surname, contact details, address and other contact information, fiscal code, IP address, education, specializations, previous work experiences, data contained in the curriculum vitae, images and/or photos included, and in general all that is necessary to the assessment and selection of personnel;
- b) (Any) particular data contained in the curriculum vitae manifestly disclosed by the data subject, including personal data suitable for revealing racial or ethnic origin and state of health (e.g. belonging to protected categories, mandatory hiring as per applicable regulations). In this regard, it is recommended to communicate or include in the curriculum vitae only the data relevant to the purpose of selection; in particular, please limit information about the state of health to what is strictly necessary to communicate the belonging to protected categories to the potential employer.

3. PURPOSE OF THE PROCESSING, LEGAL BASIS OF THE PROCESSING, NATURE OF THE PROVISION AND DATA RETENTION

Personal data collected will be processed, according to the regulations in force, for the following purposes:

Purpose of the processing	Legal basis	Nature of the provision	Data retention
<p>a) Management of personnel recruitment, selection and assessment process: compilation of data collection form in the area "Join our team"; analysis and assessment of the application in reply of the open positions published on our website and on other communication channels (including, for example, LinkedIn) to the purpose of a possible selection procedure; personnel selection to the purpose of establishing a possible employment relationship, also for different positions and/or future positions with respect to those for which the subject applied spontaneously; information email sent by data controller concerning the progress of the selection procedure; interviews and possible video-interviews in live mode (processing also of the image/audio of the subject); assessment of the screening/aptitude tests; filling out employment forms and/or pre-selection questions; possible stipulation of an employment and/or stage/internship contract.</p>	<p>Art. 6, para. 1, lett. b) GDPR - processing is necessary for the implementation of pre-contract measures taken at the request of the data subject.</p> <p>For particular data: Art. 9, para. 2, lett. a) GDPR – Consent of the data subject</p>	<p>Provision of personal data is necessary to the selection of personnel. Failure to provide the data will make application of the data subject impossible and therefore his/her participation to the personnel selection process put in place by the Data Controller.</p> <p>Provision of special categories of data is discretionary.</p>	<p>Throughout the duration of the selection procedure and for the next 48 months.</p>

<p>b) Communication of personal data collected and submission of curriculum vitae to other BLM GROUP companies to carry out recruitment and selection of their personnel.</p>	<p>Art. 6, para. 1, lett. f) GDPR - Legitimate interest of the Data Controller.</p>	<p>Provision of personal data is discretionary. In case of denial, the Data Controller is not allowed to communicate personal data to other companies of the Group.</p>	<p>Throughout the duration of the selection procedure and for the next 48 months.</p>
<p>c) Possible creation of a personal account to register to the recruiting platform of the Data Controller; confirmation email with access links to complete registration; filling out of the application and management of their own private area.</p>	<p>Art. 6, para. 1, lett. b) GDPR - processing is necessary for the implementation of pre-contract measures taken at the request of the data subject.</p>	<p>Provision of personal data is necessary to create the personal account. Failure to provide the data will make it impossible for the data subject to complete the registration of the account. The data subject can however apply continuing as "Guest".</p>	<p>Throughout the duration of the selection procedure and for the next 48 months.</p>
<p>d) Organization and management of specific training courses: get in touch to offer specific training courses, organized in collaboration with and a public or private training centres, to the purpose of establishing a possible employment relationship at the Data Controller; collection and organization of applications; course management.</p>	<p>Art. 6, para. 1, lett. a) GDPR - Consent of the data subject</p>	<p>Provision of personal data is discretionary. Failure to provide personal data will make it impossible for the Data Controller to contact the data subject to offer such specific training courses.</p>	<p>48 months.</p>

4. PROCESSING MODE AND DURATION

Personal data will be processed by subjects authorized by the Data Controller using tools for recording and storing them, manual, electronic and automated (Recruiting platform) and using appropriate measures to ensure the security and confidentiality of the data and to prevent access by unauthorised third parties. There are no decisional processes fully automated.

5. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

Personal data will be collected and processed by authorised personnel of the Data Controller (Art. 29 GDPR) according to specific instructions provided for the processing purposes and methods and may be processed by recipients acting as Data Processors (Art. 28 GDPR) or as autonomous Data Controllers.

More precisely, they can be processed by: - Group companies also in EEA and extra-EEA countries; - external consultants acting for the Data Controller within the personnel assessment and selection process and labour consultants; - companies providing services to manage and maintain the Recruiting platform (Cornerstone OnDemand Europe Ltd.); - companies providing services to manage the telecommunication networks and/or manage the information system of BLM GROUP (email and SW platforms included); - consulting companies; - authorities competent to comply with legal obligations and/or provisions of public bodies, upon request. This list is provided as an example.

Personal data are not subject to disclosure.

6. DATA PROCESSING PLACE

The activity takes place on the territory of the European Union. However, personal data may also be transferred to extra-EEA countries under article 44 and subsequent of the GDPR, i.e. to third countries and international organizations for which the Commission has intervened with an adequacy decision (art. 45 GDPR); - to subjects providing suitable guarantees, with standard contractual clauses (SCC) of the Commission (art. 46 GDPR).

7. RIGHTS OF THE DATA SUBJECT

The GDPR gives the Data Subject the right to exercise the following rights concerning personal data concerning them by writing to the Data Controller at the above-mentioned e-mail address. In particular, you have the right, at any time, to ask the Data Controller access to your personal data, rectification, cancellation or limitation of data processing; it is also within your rights to request data portability and in this case they will be provided in a structured format, commonly used and readable, by an automatic device, or object to personal data processing based on the legitimate interest as well as withdraw consent at any time, without affecting the lawfulness of processing. You have also the right to lodge a complaint with the Guarantor for the protection of personal data if you believe that the processing of your personal data breaches the provisions of the Regulation; the Guarantor for the protection of personal data can be contacted using the contact details indicated on the website of the Authority itself "www.garanteprivacy.it". In any case, we would like to have the opportunity to address beforehand any concern of the data subjects who can send an email to the address privacy@blmgroup.it or use the other contact details of the Data Controller indicated above for any clarification concerning processing of their personal data and to exercise the related rights, withdrawal of consent included.

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