

PRIVACY NOTICE FOR CANDIDATES
pursuant to articles 13 and 14 of the Regulation (EU) N. 679/2016

This privacy notice, provided to data subjects in compliance with articles 13 and 14 of Regulation (EU) No. 679/2016 (General Data Protection Regulation, hereinafter "**GDPR**") and with the Swiss Federal Act on the Data Protection describes the processing of personal data carried out by E-work S.p.A., E-work HR Company Poland Sp. z o.o. and e-work Sagl, belonging to the e-work group ("**Group**"), as joint controllers ("**Joint Controllers**" or "**Companies**").

The Joint Controllers, for the benefit of your need to achieve your job placement goal faster, share a common database, thereby increasing - the match between supply and demand in the labour market.

The Joint Controllers will process your personal data in accordance with the obligations and responsibilities governed in the joint controllership agreement drafted by them in accordance with article 26 of the GDPR. The essential content of the agreement is available at the following link <https://www.e-workspa.it/privacy/>.

It should be noted how this privacy notice only includes the processing carried out by the Companies as Joint Controllers.



Who determines how and why your personal data are processed?

The Joint Controllers of your personal data are:

- **E-work S.p.A.** with registered office at Via Teocrito 47, 20128, Milano (MI), Tax Code and VAT number 13063380151, e-mail: privacy@e-workspa.it; and
- **E-work HR Company Poland Sp. z o.o.** with registered office at 90-318 Łódź, Sienkiewicza 82/84, Tax Code and VAT number 7262395049, e-mail: iod@e-workspa.pl; and
- **E-work Sagl** with registered office at Via Vegezzi, 4, 6900, Lugano, e-mail: privacy@e-work.ch.



What is the source of your personal data?

Your personal data are usually collected directly from you when you register in the reserved area of the website and create a profile or, in any case, when you provide us your curriculum vitae at our offices.

In some cases, your personal data will also be collected from third parties (e.g. job recruiting platforms, such as InfoJobs, Indeed, LinkedIn etc.).



Has a data protection officer been appointed?

E-Work S.p.A. has appointed a data protection officer (hereinafter referred to as "**DPO**") who can be contacted at the following e-mail address: rpd@e-workspa.it.



Which personal data do we process?

The Joint Controllers will process the following personal data:

- **identification and contact personal data:** name and last name, country, citizenship, date of birth, address, email address, mobile number;
- **data contained in the curriculum vitae:** data relating to previous work experience (such as positions held, date of employment, company role, remuneration and any benefits), education related data, professional qualifications, certificates, image (where contained in the curriculum vitae) and other personal data included in the curriculum vitae;
- **special categories of data:** the Joint Controllers, where provided, may process special categories of data, such as health-related data (e.g., with reference to the membership of data subjects to protected categories).
- **any other personal data provided by you** (e.g. type of driving license, visa/residence permit, etc.);

- **login credentials to the reserved area of the website.**



What are the purposes and the legal basis of the processing?

Your personal data will be processed for the following purposes and based on the following legal basis of the processing:

- **research and selection** of candidates for job positions available at Joint Controllers' clients and Joint Controllers themselves (internal job positions) in order to establish an employment or collaboration relationship with them.

The legal basis of the processing is the performance of a contract to which you are a party or the necessity to take steps at your request prior to entering into a contract.

In case of processing of special categories of personal data, the processing would be legitimate under art. 9, par. 2, lett. b) of the GDPR, as it is necessary for the purposes of carrying out the **obligations and exercising specific rights of the Joint Controllers or of the data subject in the field of employment and social security and social protection law.**

The provision of personal data for this purpose is necessary in order to evaluate your application; failure to provide such data entails the impossibility for the Joint Controllers to consider your application and to initiate the research and selection process.

- Allow you to **register and create a profile** in the reserved area of the website, to apply for jobs available to the Joint Data Controllers' clients and the Joint Data Controllers themselves.

The legal basis of the processing is the performance of a contract to which you are a party or the necessity to take steps at your request prior to entering a contract.

The provision of your data for this purpose is necessary to allow you to register and create a profile on the website and in the absence, it will not be possible to proceed with registration.

- **Fulfill the legal obligations** to which Joint Controllers are subject (e.g. targeted placement).

The legal basis of the processing is the fulfilment of legal obligations to which the Joint Controllers are subject.

The provision of your data is necessary to allow the Joint Data Controllers to comply with the legal obligations to which they are subject, and, in the absence, it will not be possible for the Joint Data Controllers to comply with these legal obligations.

- **Send you communications** via e-mail relating to **job offers available for job positions** open at Joint Controllers' clients and Joint Controllers themselves.

The legal basis of the processing is the legitimate interest of the Joint Controllers to keep you informed about available job offers.

The provision of personal data for this purpose is optional and you can object to such processing at any time.



How long personal data are stored?

We retain personal data only for the time necessary for the purposes for which they were collected or for any other related legitimate purpose. Therefore, if personal data are processed for two different purposes, we will retain the aforementioned data until the purpose with the longer-term ends. In any case, we will no longer process personal data for that purpose for which the retention period has expired. Personal data that are no longer necessary, or for which there is not a legal basis for their retention, will be irreversibly anonymized (and thus can be retained) or deleted.

Personal data processed for the **purpose of research and selection** and for the **purpose of registration and creation of a personal account in the reserved area of the website** are retained for a period of 24 months from their provision or from your last access to your online account (i.e. reserved area of the website); in case of your inactivity for a period of 23 months (i.e. failure to log in to your online account) an alert system will invite you, by sending communications (2 alerts occurring in the last month), to access to the reserved area of the website. After 2 alerts, in case of persistent inactivity, your profile will be deleted. In any case, you can delete your personal online account at any time through the appropriate feature available in the reserved area.

Personal data processed for the **purpose of sending communications regarding available job offers** are retained as long as you keep your online account active or until you exercise your right to object to the processing, if previous. You will be regularly reminded about your right to object to processing carried out for such purpose.



What recipients do we share your personal data with?

Your personal data will be disclosed to subjects operating as autonomous data controllers, such as Joint Controllers' clients (private and public organizations), as well as to data processors to whom specific instructions on the processing of your data have been provided, such as companies which provide IT services to us (e.g. common database management, maintenance of IT systems, hosting services, etc.).

In addition, in the light of the implementation of a common database, the data will be accessed by the Joint Controllers for the above-mentioned purposes.



Will your personal data be transferred outside of the EU?

Due to the location of the company that manages and maintains our common database and the location of the registered office of e-work Sagl, your personal data will be transferred to Switzerland, a country for which the European Commission has issued an adequacy decision and where the Swiss Federal Act on Data Protection RS.235.1 applies.

In any case, where the Joint Controllers, due to the location of their service providers, need to transfer data outside the European Union to countries for which the European Commission has not issued an adequacy decision, the Joint Controllers undertake to ensure adequate levels of protection and safeguards, including contractual ones, compliant with the applicable laws, including the adoption of standard contractual clauses pursuant to article 46, par. 2, letter c), of the GDPR, supplemented if necessary by additional technical, legal and organizational measures necessary to ensure that the level of protection of personal data is equivalent to the one of the European Union.



What are your privacy rights in relation to your personal data?

In relation to the processing of your personal data you will always be able to exercise your rights provided by the GDPR (articles 15-21), such as:

- the right to obtain from Joint Controllers confirmation as to whether or not your personal data are being processed and the right to know what personal data are being processed and how they are being used (**right of access**);
- the right to request the updating, modification and/or correction of your personal data (**right to rectification**);
- the right to request the deletion of your personal data (**right to be forgotten**);
- the right to request the restriction of processing of your personal data (**right to restriction of processing**);
- the right to receive a copy of your personal data in electronic format and request that these data will be transmitted to another data controller (**right to data portability**).

In addition, you can object to the processing at any time where the processing is based on our legitimate interest (**right to object**), such as in the case of processing carried out for the purpose of sending communications, via e-mail, regarding available job offers for job positions open at the Joint Controllers' clients.

To exercise your rights, you may send a request to **E-work S.p.A.**:

- to the e-mail address: privacy@e-workspa.it;
- to the DPO e-mail address: rpd@e-workspa.it;
- by paper mail to the following address: Via Teocrito 47, 20128, Milano (MI);

or you may send a request to **E-work HR Company Poland Sp. z o.o.**:

- to the e-mail address: iod@e-workspa.pl;
- by paper mail to the following address: 90-318 Łódź, Sienkiewicza 82/84;

or you may send a request to **e-work Sagl**:

- to the e-mail address: privacy@e-work.ch;
- by paper mail to the following address: Via Vegezzi 4, CH-6900 Lugano.



What other rights can you exercise in relation to your personal data?

If you consider that the processing of your personal data is in violation of the applicable data protection law, you always have the right to lodge a complaint with the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

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WORDING FOR THE ACKNOWLEDGEMENT OF THE PRIVACY NOTICE

I declare that I have read and understood the **privacy notice**

