Privacy policy on the personal data processing of candidates

CTAO gGmbH, with registered office in Saupfercheckweg 1, 69117 Heidelberg (Germany), German VAT no. DE296943397, enrolled with the HRB of the Court of Mannheim (Germany) no. 720310, Italian Fiscal Code, 94136840215, domiciled in Bologna, Via Piero Gobetti no. 93, as data controller (hereinafter, "**Data Controller**"), informs you pursuant the EU Regulation no. 679/2016 ("**GDPR**") and the applicable national Data Protection law that your personal data shall be processed according to the following modalities and for the following purposes:

1. **Scope of Data Processing**

The Data Controller processes the following personal data (hereinafter "**Data**" or "**Personal Data**") communicated by you (or by third parties, as subject in charge of the recruitment process) during the recruiting phase and during the job interview:
- Identifying Data such as, by way of example, name, surname, address, place and date of birth, fiscal code and – whether necessary – banking references;
- Sensitive Data relating the health condition such as, by way of example, data relating the suitability to specific works, data relating the belonging to protected categories;
- Possible judiciary Data such as, by way of example, the police registry and the certificate relating pending convictions, whether necessary pursuant to the law and according to the specific job post.

2. **Purposes of Data processing**

Your Personal Data shall be processed, without your prior consent, for the following purposes:

2. 1) the **execution of the contract and/or the fulfillment of pre-contractual obligations**, in particular:
- the correct performance of the selection phase (e.g., management of the applications);
- allow you to apply for a specific job post;
- use your profile also for job posts other than the one you have applied for and for which your profile results suitable and compatible with the search;
- the possible fulfilment of pre-contractual fulfillments necessary to the entering into an employment relationship;

2. 2) the **fulfillment by the Data Controller of legal obligations** such as:
- the fulfillment of legal and contractual obligations, including those deriving from the collective agreement;
- the fulfillment of obligations towards social security and assistance institutions, both mandatory and supplementary;
- the assumption of obligations towards the financial administration;
- the bookkeeping and the related obligations;
- the compilation and processing of tax returns and the related requirements;
- the hygiene and safety at work (including the obligations deriving from insurance contracts for the coverage of risks related to the employer's liability);

2.3) the **pursuing of a lawful interest by the Data Controller**, in particular:
- the exercising of rights by the Data Controller in Court and conducting of litigation;
- the prevention and identification of fraudulent activities.

3. **Modalities of Data processing**

The processing of your Data is carried out, both via hardcopy (paper) and electronic modalities, by means of data collection, registration, organization, storage, consultation, elaboration, amendment, selection, mining, confrontation, usage, interconnection, blockage, communication, cancellation and destruction operations.

4. **Storage of Data**

The Data Controller shall process the Personal Data for the time necessary to fulfill the above purposes and anyway for a period not exceeding 24 months from the collection in case no employment relationship is entered

into or, in case of employment relationship, for a period not exceeding 10 years from the termination of the same employment relationship.

5. **Nature of the Data provision and consequences of a refusal to answer**

The provision of Data for the above purposes is necessary and mandatory and any possible refusal to provide said Data entails the impossibility to continue the selection phase and, eventually, to enter into or continue with the employment relationship.

6. **Access to Data**

Your Data may be made accessible for the purposes mentioned above to:
- employees and/or collaborators of the Data Controller (e.g. human resources personnel), in light of their role of persons in charge of the processing and/or internal Data Processors and/or system administrators;
- third party subjects (e.g. recruiting companies and/or staff-supply agencies, accountant, payroll and labor consultant, health organizations, insurance funds and integrative health assistance, also corporate, banking institutions, brokerage houses and administrative procedures, associations of employers, independent contractors, etc.) carrying out outsourcing activities on behalf of the Data Controller and processing Data as external Data Processors.

7. **Data Communication**

Your Data may be communicated, even without your prior consent, upon their request, to control bodies, police or judiciary bodies, Budgetary Ministry, Tax Authority, ministerial bodies and competent Authorities, Local Institutions (Regions, Provinces, Municipalities), Regional and Local Tax Commissions, that will process them in their quality of independent Data Controllers for institutional purposes and/or pursuant to the law during investigations and controls. Moreover, your Data may be communicated to third parties (for example, insurance funds, independent contractors, etc.) that will process them as independent Data Controllers to carry out activities that are instrumental to the above purposes.

8. **Transfer of Data**

Your Data shall not be disseminated and transferred to extra-EU countries.

9. **Data subjects' rights**

The Data Controller informs you that you, as Data Subject, have the right to:
- obtain confirmation over the existence or inexistence of Personal Data relating you, even if not yet registered, and their communication in a comprehensible way;
- obtain the indication and, if necessary, the copy of the: a) source and category of the Personal Data; b) logic applied in case the processing is performed by means of electronic instruments; c) purposes and modalities of the processing; d) identification references of the Data Controller and the Data Processors; e) subjects or categories of subjects to whom Personal Data may be communicated or who may come to know, in particular if recipients are extra-EU countries or international organizations; e) period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period; f) existence of an automated decision-making process and, in this case, information about the logic involved, the significance and consequences for the data subject; g) existence of adequate safeguards in case of transfer of Personal Data to an extra-EU country or international organization;
- obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- obtain the cancellation, the transformation into anonymous form or blocking of the Data: a) processed in breach of the law; b) no longer necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) if you withdraw consent on which the processing is based and there is no other legal ground for the processing; d) if you object to the processing and there are no overriding legitimate grounds for the processing; e) in compliance with a legal obligation; f) referred to children. The Data Controller may refuse to erase them when the processing is necessary: a) to

exercise the right of freedom of expression and information; b) in compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority; c) for reasons of public interest; d) to achieve purposes in the public interest, scientific or historical research purposes or statistical purposes; e) for making legal claims;

- obtain the restriction of processing when: a) the accuracy of the Personal Data is contested; b) the processing is unlawful and the data subject opposes the erasure of the Personal Data; c) Data are required by you for your exercising of legal claims; d) pending verification whether the legitimate grounds of the controller override those of the data subject;

- receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means;

- oppose, in whole or in part: a) for lawful grounds to the processing of Personal Data regarding you, even if pertaining the purpose of Data collection; b) to the processing of Personal Data that relates to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication, by means of automated call systems without the intervention of an operator, e-mail and/or traditional marketing methods by telephone and/or paper mail.

- submit a data protection complaint to the competent supervisory authority.

In the cases mentioned above, if necessary, the Data Controller shall communicate any exercise of your rights to each third party to whom the Personal Data are communicated, except for specific cases (for example, if this proves impossible or involves disproportionate effort).

10. Modalities of exercise of rights

You shall be able to exercise your rights anytime:
- by sending a registered mail with return receipt to the address of the Data Controller in Bologna, Via Piero Gobetti no. 93;
- by sending an email to info@cta-observatory.org.

11. Data Controller, data processor and persons in charge of the data processing

The Data Controller is CTAO gGmbH, with registered office in Saupfercheckweg 1, 69117 Heidelberg (Germany) and elected domicile in Bologna, Via Piero Gobetti, no. 93.

The updated list of the data processors and persons in charge of the processing is available at the project office of the Data Controller.