



DISCLOSURE
pursuant to art. 13 and 14, EU Regulation 2016/679

Following the entry into force of Regulation (EU) 2016/679 on the protection of personal data (“**GDPR**”) with this document (“**Disclosure**”), the Owner, as defined below, wishes to inform You on the purposes and modalities of the processing of Your personal data and Your rights as data subject.

1. Who is the Owner of the processing?

The Owner is Magister Group SRL, Legal Headquarter in Rome, Via del Viminale 43, represented by the pro tempore attorney.

The Owner may be contacted to exercise his rights listed in point 8, and may also receive information by writing an email to: privacy@magistergroup.it

2. Which personal data do we process?

2.1. Personal common data

For the purposes indicated in this Policy, the Owner treats the common personal data that are, for example, personal data (name, surname, address, telephone number, e-mail and other contact details), qualifications, competences, certificates, knowledge of foreign languages, current fee, as well as any additional personal data contained in Your CV or that You will communicate to the Owner during the selection and recruitment process.

2.2. Particular categories of personal data

The particular categories of personal data are the ones that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, as well as processing genetic data, biometric data designed to uniquely identify a person, data relating to health or sex life or sexual orientation of the person.

Therefore, to ensure greater protection, the Owner does not intend to process these categories of personal data. For this purpose, please do not write in Your CV personal data belonging to the above mentioned categories.

Should you state particular categories of personal data, the Owner won't consider Your CV for the recruitment process.

Should You belong to the legally protected status, we invite You not to write the reason of the status, only Your belonging to the category.

2.3. Origin of personal data

The personal data processed will be given to the Owner directly by You by loading the CV through the *Workable* platform, or collected by the Owner from different job search platforms and uploaded on *Workable*.

Furthermore, the Owner will process all additional personal data that You provide on the occasion of subsequent contacts, including those collected during job interviews.

3. Purpose of the processing and legal basis

Your personal data will exclusively be processed for Your application and the activities connected to it.

In addition, Your personal data may be processed for the fulfillment of legal obligations under national or community laws and/or national or community regulations the Owner is required to observe.

The legal basis for processing Your personal data in order to manage Your application is the need to **execute Your request**, in accordance with Article 6, paragraph 1, letter b), GDPR. Therefore, it is not necessary to obtain Your prior consent to the processing.



For the **fulfillment of legal obligations**, the legal basis is the **need to fulfill a legal obligation**, in accordance with Article 6, paragraph 1, letter c), GDPR.

4. Nature of conferral and consequences of refusal to provide personal data

The provision of the personal data indicated is a necessary requirement for the management of Your application and the conclusion of the employment contract.

5. Period of preservation of Your personal data

Your personal data will be processed by the Owner for the period necessary to manage Your application. In any case, Your personal data will only be kept for 24 months from its acquisition or from the negative result of the selection.

6. How will Your personal data be processed?

The processing of Your personal data will take place through paper, computer and telematics tools, with logics strictly related to the stated purposes and, however, in such a way as to ensure their security and confidentiality in accordance with Article 32 GDPR.

7. To which subjects can Your personal data be communicated and who can learn about it?

For the purposes described in point 3 above, Your personal data will be known by the employees of the Owner, who will act as persons authorized to process personal data.

Furthermore, Your personal data may be transferred to third parties belonging to these categories:

- a) entities providing IT system management and personal data storage services;
- b) entities providing legal and/or tax advice;
- c) authorities and supervisor bodies.

The persons belonging to the above categories operate, in some cases, in total autonomy as separate controllers; in other cases, as data controller specifically appointed by the Owner in accordance with Article 28 of GDPR.

The complete and updated list of subjects to whom your personal data can be communicated can be requested by writing to the email address privacy@magistergroup.it.

Transfer outside the European Union

The personal data processed by the Owner will also be transferred outside the European Union for archiving purposes. In any case, the Owner assures You that Your personal data will be transferred to third countries, on the basis of an adequacy decision of the European Commission, in accordance with Article 45 of GDPR, in the case of standard contractual clauses pursuant to Article 46 of GDPR, or in the case of one of the derogations specifically provided for in Article 49 of GDPR.

In particular, Your personal data will be transferred to the United States to other companies of the *Workable* group in order to receive support for the pursuit of the purposes indicated in this Disclosure. These transfers take place on the basis of an adequacy decision of the European Commission.

All companies that process Your personal data outside the European Union have been appointed by the Owner in accordance with Article 28 of GDPR, including security measures for Your personal data.

Your personal data won't be publicized.



8. What rights do You have as interested party?

In relation to the processing described in this disclosure, as an interested party, You may, at the conditions laid down in the GDPR, exercise the rights set out in Articles 15 to 21 of GDPR and, in particular:

- **Right of access** – article 15 of GDPR: right to obtain confirmation that Your personal data are/aren't being processed and, in that case, to obtain access to Your personal data – including a copy of them – and the communication, among others, of the following information:
 - a) purpose of the processing
 - b) categories of the processed personal data
 - c) addressee of these data
 - d) period of conservation or used criterion
 - e) rights of the interested party (adjustments, cancellation of personal data, limitation of the processing and right to oppose to the processing)
 - f) right to lodge a complaint
 - g) right to receive information about the origin of my personal data, if they were not collected by the interested party
 - h) existence of an automatized and automated process, including profiling
- **Right to adjustment** – article 16 of GDPR: right to obtain, without unjustified delay, the adjustment of Your inaccurate data and/or the integration of incomplete personal data.
- **Right to cancellation (right to be forgotten)** – article 17 of GDPR: right to obtain, without unjustified delay, the cancellation of Your personal data when:
 - a) Data are no longer necessary for the purpose they were firstly collected or processed
 - b) You have revoked Your consent and there is no juridical basis for the processing
 - c) You have successfully opposed yourself against the processing of Your personal data
 - d) Your data are unlawfully processed
 - e) Data must be deleted to fulfill a legal obligation
 - f) Your personal data have been collected in relation to the provision of information society services referred to in Article 8.1 of GDPR

The right to cancellation shall not apply to the extent that processing is necessary for the fulfillment of a legal obligation or for the performance of a task in public interest; or for the establishment, exercise or defense of a right in the courts.

- **Right to limit the processing**– article 18 of GDPR: right to obtain the limitation of the processing, when:
 - a) the interested party questions the accuracy of his personal data
 - b) the processing is illicit and the interested party disagrees with the cancellation of his personal data and asks for a limited use of them



c) although the controller no longer needs them for the purposes of processing, personal data are necessary for the interested party to establish, exercise or defend a right in court

d) the interested party objects to the processing before the evaluation of the presence of legitimate reasons of the controller which may be more than those of the interested party

- **Right to data portability** – article 20 of GDPR: right to receive, in a structured format, in common use and readable from an automatic device, the personal data concerning You, provided to the Owner and the right to transmit them to another holder without hindrance, if the processing is based on the consent or execution of a contract and is carried out by automated means. In addition, the right to obtain the transmission of Your personal data by the Owner to another holder, if this is technically feasible.
- **Right to lodge a complaint to the Supervisor for the protection of personal data**, Piazza di Montecitorio n. 121, 00186, Roma (RM).

The above rights may be exercised, in respect of the Owner, by contacting the references indicated in point 1 above.

The Owner will take charge of Your request and provide You, without undue delay and, in any case, within one month of the receipt of the same, information about the action taken regarding Your request.

The exercise of Your rights as an interested party is free under Article 12 of GDPR. However, in the case of manifestly unfounded or excessive requests, including their repetitiveness, the Owner could charge you a reasonable fee, in light of the administrative costs incurred to manage Your request, or deny the satisfaction of the request.

Furthermore, we inform You that the Owner could ask for additional information in order to confirm the identity of the interested party.