

**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA**  
**- Article 13 of Regulation (EU) 2016/679 -**

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “GDPR”), the following information is provided to ensure that data subjects submitting their applications are aware of how their personal data will be processed.

a) Identity and contact details of the Data Controller

The Data Controller is the Professional Association *mgc creo+*, with its registered office in Milan, Via Pontaccio, 10 (hereinafter also referred to as the “Data Controller” or “*mgc creo+*”).

For any enquiries regarding *privacy*, the Data Controller may be contacted by writing to the address given above or by sending a certified email (PEC) to [mgicreo@legalmail.it](mailto:mgicreo@legalmail.it)

b) Methods of processing

Data processing may be carried out using both paper-based and electronic methods.

c) Types of data, purposes of processing and legal basis for processing

In the context of the relationship with the candidate, **personal data** is processed (e.g. , first name, surname, telephone number, email address , and data contained in *the CV*). The data subject must promptly notify the Data Controller of any changes to such data.

Furthermore, the Data Controller may become aware of and process ‘**special categories of data**’ as referred to in Article 9 of the GDPR (so-called ‘sensitive data’) which reveal:

- 1) racial or ethnic origin (e.g. as may be discernible from personal details, etc.);
- 2) health status (e.g. in the case of membership of protected categories, etc.).

The processing of the data subject’s personal data is carried out for the following **purposes**:

- 1) recruitment and selection of candidates;
- 2) managing relations with candidates;
- 3) interviews with candidates;
- 4) exercising the rights of the Data Controller, including, for example, the right to defend itself in legal proceedings;
- 5) compliance with requirements imposed by the judicial authorities.

The **legal basis** for the processing is as specified below:

- the implementation of pre-contractual measures taken at the data subject’s request [with particular regard to the purposes set out in points 1), 2) and 3)];
- compliance with a legal obligation to which the Data Controller is subject [with particular regard to the purpose referred to in point 5)];
- the pursuit of the Data Controller’s legitimate interests [with particular regard to the purpose referred to in point 4)];
- the need to establish, exercise or defend a legal claim in court or whenever the courts exercise their judicial functions [with particular regard to the purpose referred to in point 4)];
- explicit consent to the processing of ‘special categories of personal data’ as referred to in Article 9 of the GDPR, as specified above, for the purposes set out above [with particular regard to the purposes referred to in points 1), 2) and 3)], where necessary.

d) Recipients or any categories of recipients of personal data

Personal data is processed within the *mgc creo+* Professional Association by persons authorised to process data who operate under the responsibility of the Data Controller.

Personal data may also be disclosed to the IT system management company and to , the website

management company (which will process the data as a data processor specifically appointed in accordance with Article 28 of the GDPR).

#### e) Data retention period

Personal data is retained for a period of five years from the end of the unsuccessful selection process.

#### f) Data rights

We would like to inform you that, with regard to your personal data, you may exercise the following rights within the limits set out in the GDPR for each of them: the right to information and access to your personal data; the right to have your personal data rectified or erased (the so-called 'right to be forgotten'); the right to restriction of processing; the right to object to processing; the right to data portability (applicable to data in electronic format).

#### g) Withdrawal of consent

We inform you that, with regard to data processing based on consent [Article 9(2)(a) of the GDPR], you have the right to withdraw your consent at any time, without this affecting the lawfulness of processing based on consent prior to its withdrawal.

#### h) Complaint

We also inform you that you have the right to lodge a complaint with the supervisory authority. For further information, please consult the official website of the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it))

#### i) Disclosure of data

The provision of personal data is necessary for the recruitment and selection of candidates. Failure to provide such data will prevent us from proceeding with the assessment of your application and the subsequent stages of the selection process.

#### j) Profiling

The Data Controller does not use automated processes for profiling.

#### k) Processing for a different purpose

Should the Data Controller intend to further process personal data for a purpose other than that for which it was collected, it will, prior to such further processing, provide the data subject with information regarding that different purpose and any further relevant information.

Following the definition of:

- "personal data" within the meaning of Article 4(1) of the GDPR: "any information relating to an identified or identifiable natural person ('data subject'); a natural person is considered identifiable if they can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity" and of
- "processing" within the meaning of Article 4, first paragraph, point (2) of the GDPR: "any operation or set of operations which is carried out on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction".