

**PERSONAL DATA PROCESSING INFORMATION**

**Privacy and transparency means, for us,**

**pledging to treat people and their personal histories with respect and due care**

**1. WHY DO WE NEED YOUR DATA?**

Personal data shall be processed, using both electronic and hard-copy instruments, in the pursuit of a legitimate interest – jointly shared, as it were, by the parties – to suggest professional opportunities to you.

Your submission of data for such purposes is required; any failure to submit the required data, or any request to have such data erased, will make it impossible for us to pursue the aforementioned, legitimate objective, or otherwise to fulfil the aforementioned activity, limited as described *supra*, with which EMA Partners Italy|Calenti & Partners as Data Controller has been tasked.

**2. WHAT PERSONAL DATA DO WE COLLECT?**

EMA Partners Italy|Calenti & Partners may process the following personal data: first name, surname, tax ID or VAT number, home address, email address, telephone number, data relating to training, education, languages spoken, IT skills, any type of professional expertise, previous jobs, hobbies and special interests, and any other item of information you have included in your resume or CV, or otherwise disclosed by you for the purposes and legitimate interests noted *supra*. The company herewith discloses that data sourced from third parties may also be processed – provided you have previously authorised the same – in order to manage the interests described in point 1, *supra*, in the most effective manner possible. More specifically, the company may process personal data relating to your professional expertise and aptitudes as provided by the following companies: Gallup Inc, Six Seconds Inc., Hogan and Decision Dynamics AB., in case you have filled out questionnaires we requested. The interview may sometimes be recorded for the sole purpose of checking that the notes taken by the interviewer actually correspond to the answers actually given. Within a maximum of one month, after the check has been made, the audio recording will be deleted from the archives.

Pursuant to Art. 6, paragraph 1, subpart (f) of the Regulation, the processing of submitted personal data is lawful in that it is necessary to pursue the Data Controller’s legitimate interest or to be able to better assess your profile, and to show it to our customers for new professional opportunities.

**3. HOW DO WE USE YOUR DATA?**

Data provided shall be collected, used and retained for the specific purpose of pursuing the lawful interests of both parties, this involves offering selection and executive search, as per point 1.

Data shall be processed through appropriate procedures and using appropriate instruments to ensure the utmost security and confidentiality, on digital and hardcopy storage media.

Data provided, which shall then be entered in our databases, shall be used for communicating with you regarding opportunities matching your professional profile.

**4. WHO DO WE SHARE YOUR DATA WITH?**

Personal data shall be processed by – in addition to the Data Controller – by the following potential recipients: the Data Controller’s employees, associates, consultants, and outsourced professionals, albeit solely for the purposes listed in point 1, and only with such parties being duly delegated specific authority by the Data Controller. Such delegation of authority shall invariably include explicit instructions as needed for them to comply with privacy regulations, especially in terms of data security. Moreover, the personal data may be processed by the Data Controller’s vendors, including but not limited to companies who manage the Data Controller’s database, companies who manage the Data Controller’s website and web platforms, and those who manage the Data Controller’s email server.

Submitted personal data shall not be subject to dissemination.

It may, however, if and when needed, be subject to disclosure as required by law.

**5. WHERE DO WE RETAIN YOUR DATA?**

Your personal data shall be managed and retained on the Data Controller's servers, or on a third-party server made available to the Data Controller by its vendors. Currently, the Data Controller's servers, and those managed by the same, are all located in the European Union.

Personal data shall be subject to transfer into the U.S., to the servers held by the company who provides database-management services for the Data Controller: Lever Inc. Currently, our agreement with Lever Inc. includes standard contractual clauses approved by the EU Commission, which ensures data processing in accordance with European privacy regulations.

**6. WHAT ARE YOUR RIGHTS?**

You have the right to:

- a) Request the Data Controller, or its representative, allow you to access your personal data, as well as correct/erase the same, or to limit processing on the same;
- b) Object to the processing of personal data;
- c) Data portability;
- d) Revoke consent at any time; such revocation of consent shall not prejudice the lawfulness of any processing based on consent provided prior to such revocation.

You may exercise the aforementioned rights at any time by sending a certified letter to the following address: Via Plinio n. 11, Milan, or by sending an email to

[privacy.emaitaly@ema-partners.com](mailto:privacy.emaitaly@ema-partners.com)

Moreover, you have the right – if you believe your rights have been violated – to file an appeal with the Data Protection Authority.

**7. HOW LONG DO WE RETAIN YOUR DATA?**

Data submitted for the purposes listed in point 1 shall be retained for thirty-six (36) months after such data has been disclosed to the Data Controller. Any audio recordings will be deleted within a maximum of 30 days from the date of the interview.

Once that retention period has expired, all collected data shall be erased/deleted from any electronic device and/or hard-copy medium, absent any instructions from you to the contrary.

**8. WHAT ARE THE PRINCIPLES AND GUARANTEES GOVERNING DATA PROCESSING?**

Information on the processing of your data shall comply with the provisions of article 13 of European Regulation 679/2016 governing privacy (article 13).

The processing of your personal data shall be governed by the tenets of fairness, lawfulness, and transparency. Such processing may be performed in an automated fashion for the purpose of storing, managing, and forwarding the personal data. If so, it shall be performed using proper instruments, both in terms of reasonableness, and technical sophistication, in order to ensure the security and confidentiality of the same, with all proper protocols to avoid the risk of loss, unauthorized access, and unlawful use or disclosure.

**9. WHO IS THE DATA CONTROLLER?**

The Data Controller is Calenti & Partners S.r.l., having its registered office in Via Plinio n. 11, Milan.