

# Imagicle Privacy Policy - Applicants

(General Data Protection Regulation – GDPR 2016/679)

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This policy is provided pursuant to articles 13 and 14 of the GDPR 679/2016 – “European regulation on the protection of personal data”.

## 1 Purposes of processing and legal basis

We inform you that the personal data you provided and acquired by Imagicle Spa directly or through the employment agencies and other personnel selection companies will be processed in compliance with the guarantees of privacy and security measures required by current legislation, including the help of electronic tools directly and/ or through third parties, for the purposes set out below together with the legal basis of reference:

	PURPOSES	PROCESSED DATA	LEGAL BASIS
A	Personnel selection	<ul style="list-style-type: none"> <li>• common Personal Data</li> <li>• curricular data and other data suitable for revealing previous training and work experiences</li> <li>• data suitable for revealing belonging to protected categories</li> <li>• data suitable to reveal the state of health</li> </ul>	Processing necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract. Art. 6 paragr. 1 lett. b)
		<ul style="list-style-type: none"> <li>• data suitable for revealing belonging to protected categories</li> <li>• data suitable to reveal the state of health</li> </ul>	The Data Subject has given consent to the processing of his or her personal data for one or more specific purposes; Art 6 c.1 lett. a)

## 2 Compulsory or optional nature of the provision of data and consequences of a refusal to provide

Pursuant to art. 9 of the GDPR, for the processing of special categories of personal data (e.g. personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) it is necessary to collect the consent of the Data Subject. The provision of data is optional but without your consent it may not be possible for the Data Controller to evaluate your application.

### 3 Retention period

The data will be processed for the period of time necessary to pursue the aforementioned purposes and in any case no longer than 5 years from their collection.

### 4 Contact details of the Data Controller

The Data Controller of your personal data is Imagicle Spa, responsible for the lawful and correct use of your personal data, and who you may contact for any information or requests at the following addresses:

Registered office: Via Fondacci 272 - 55054 - Massarosa (LU)

Telephone: +39.0584.943232

Fax: +39.0584.943325

E-mail: [administration@imagicle.com](mailto:administration@imagicle.com)

Certified Email: [imagicle@legalmail.it](mailto:imagicle@legalmail.it)

You may furthermore address the Data Protection Officer to acquire information and forward requests regarding your data or to communicate disservices or any problem you may have encountered at the following addresses:

Name: Aksilia Srl

Registered office: Via Fontana 22 - 20122 - Milano (MI)

Telephone: +39.02.40703351

E-mail: [aksilia@aksilia.com](mailto:aksilia@aksilia.com)

Certified Email: [consiliasrl@pec.it](mailto:consiliasrl@pec.it)

In the person of the reference manager, Dr. Battaglia Chiara, reachable at the abovementioned contact data and at the following cellphone number: +39.3478267770.

### 5 Receiver and transfer of non-EU data

Your data may be transferred outside the EEC. In this case the Data Controller ensures that the processing of your personal data by these subjects to whom the data is transferred, will be done in accordance with the European Regulation 679/2016, in compliance with the principles given in Art. 45 of GDPR 2016/679 in relation to the subsistence of adequacy decision by the European Commission, or in the absence of such decisions, in the presence of appropriate safeguards pursuant to Art. 46 of GDPR 2016/679 or in compliance to Art. 49 paragr. 1 lett. b) or c) – transfer necessary for the execution of a contract concluded between the Data Subject and the Data Controller. Further details and copy of the data may be obtained by contacting the Data Controller at the addresses given in point above.

Your data can be communicated not only to the personnel assigned to the processing but also to the following:

- a) Consultants and companies that assist the Data Controller from an IT, infrastructural point of view and for the management of communication networks
- b) Professionals, consortia and service companies and professional firms in the field of assistance and consultancy relationships (e.g. from a tax, commercial, legal, communication point of view, etc.)
- c) Companies for job placement or training
- d) Health organizations, medical and paramedical personnel

- e) Suppliers and/ or other qualified subjects who provide the Company with services or services that are instrumental to the management of the personnel selection process (e.g. employment consultants, personnel selection agencies, etc.)

The data will not be subject to other methods of dissemination.

## 6 Rights of the Data Subject

We inform you that as Data Subject you have, in addition to the right to submit a complaint to the Supervisory Authority, the rights listed below, which you can assert by asking a specific request to the Data Controller and/ or the Data Processor, contacting them at the addresses indicated in point 4.

GDPR REGULATORY REF.	RIGHTS OF THE DATA SUBJECT
<b>Art. 13, 14 – Right to be informed</b>	You have the right to be informed about the rules, guarantees and rights in relation to the processing of your personal data and how to exercise your rights in relation to such processing. In particular, you have the right to have information regarding the specific purposes for which personal data are processed, the legal bases and the expected retention times
<b>Art. 15 – Right of access</b>	You have the right to obtain from the Controller, confirmation as to whether or not your personal data are being processed, and where this is the case, access to the personal data and information regarding the processing.
<b>Art. 16 – Right of rectification</b>	You have the right to obtain from the Controller without undue delay, the rectification of inaccurate personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, also by means of providing a supplementary statement.
<b>Art. 17 – Right of erasure (right to be forgotten)</b>	You have the right to obtain from the Controller, the erasure of your personal data without undue delay and the Controller is obliged to erase the personal data without undue delay.
<b>Art. 18 – Right to restriction of processing</b>	You have the right to obtain from the Controller, restriction of processing where one of the following applies: a) The accuracy of the personal data is contested by the data subject, for a period enabling the Controller to verify the accuracy of the personal data

	<ul style="list-style-type: none"> <li>b) The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead</li> <li>c) The Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims</li> <li>d) The data subject has objected to processing pursuant to Art. 21, paragraph 1, pending the verification whether the legitimate grounds of the controller override those of the data subject</li> </ul>
<p><b>Art. 20 – Right to data portability</b></p>	<p>You have the right to receive data in structured, commonly used and machine-readable format automatized devices, and have the right to transmit such data to another Controller without hindrance from the Controller to which the data has been given. In exercising your rights regarding data portability, you are entitled to have the data transmitted directly from one Controller to the other, where technically feasible.</p>
<p><b>Art. 21 – Right to object</b></p>	<p>You have the right to object at any time to the processing of your personal data on grounds relating to your personal situation, based on Art. 6, paragraph 1, letters e) or f), including profiling based on those provisions. If you provided your consent to one or more specific objectives, you have the right to revoke that consent any time.</p>
<p><b>Art. 22 – Right to automated decision making, including profiling</b></p>	<p>You have the right not to be subjected to a decision based solely on automated processing including profiling, which produces legal effects concerning yourself or similarly affecting you.</p>

