

Privacy Notice on Personal Data Processing CANDIDATES

Dear Sir/Madam,

Pursuant to and for the purposes of European Regulation 2016/679 (hereinafter the “Regulation”), we hereby provide you with the following information regarding the processing of personal data that you provide to us when you submit your application for assessment of your professional profile and any selection process relating to establishing an employment relationship or a professional collaboration, internship or traineeship.

Data Controller

The Data Controller, meaning the entity responsible for decisions regarding the purposes, methods and security of personal data processing, is CONAI – Consorzio Nazionale Imballaggi (National Packaging Consortium), with registered office in Rome, Via Tomacelli 132, and operational office in Milan, Via Pompeo Litta 5 – Tel. +39 02 540441.

Data Protection Officer

The Data Protection Officer (DPO) appointed by CONAI can be contacted by sending an email to dpo@conai.org.

Personal data

“Personal data” means any information that concerns you and is attributable to you.

Specifically, processing may concern personal details such as forename and surname, email address, residential address, date of birth, telephone number, and additional data you include in your application (such as education, professional experience, personal interests, image), as well as any “special” categories of data under Article 9 of the Regulation, if necessary for your application, such as possible membership of protected categories (hereinafter the “Data”).

CONAI encourages applicants to omit “special” categories of data under Article 9 of the Regulation or, in general, personal data that is unnecessary or not relevant for the purpose of the application. In any case, if such information is provided, it will not be used.

Purposes and legal bases of processing

The Data provided will be processed for the following purposes and on the following legal bases:

PURPOSE <i>(Why we process your Data)</i>	LEGAL BASIS <i>(On what legal ground we process your Data)</i>	CONSEQUENCES OF REFUSAL TO CONSENT TO PROCESSING <i>(What happens if you refuse to provide and/or authorise the processing of your Data)</i>
Activities relating to recruitment and selection of staff, assessment of your professional profile and any selection process relating to establishing an employment relationship or a professional collaboration, internship or traineeship.	For personal data: performance of pre-contractual measures taken at your request (Article 6.1, point (b) of the Regulation). For any necessary special categories of data you provide, such as membership of protected categories: fulfilment of obligations and exercise of rights under labour law (Article 9.1, point (b) of the Regulation).	Providing your Data is optional but necessary in order to assess of your professional profile and any selection process relating to establishing an employment relationship or a professional collaboration, internship or traineeship. Failure to provide your Data will make it objectively impossible to carry out the activities indicated.

Methods of processing

For the purposes referred to above, the Data will be processed in paper form and by electronic means, in compliance with the regulations on the processing of personal data, and adopting appropriate security measures.

Processing of the Data will be managed by CONAI internal staff who perform activities connected with and instrumental to managing employment relationships, specifically authorised, trained and instructed to ensure adequate security and confidentiality, and to avoid the risks of loss and/or destruction or access by unauthorised parties.

CONAI does not use automated decision-making processes for the assessment of applications.

Communication and dissemination of Data

The Data will not be disclosed in any way.

The Data may be processed by entities specifically appointed as Data Processors (individuals or organisations processing data according to CONAI's documented instructions), such as: companies responsible for the management and maintenance of IT systems, entities responsible for staff recruitment and selection, hosting providers or other IT service providers.

The updated list of Data Processors can be requested from CONAI.

Data retention period

If no employment relationship or professional collaboration, internship or traineeship is established, the Data will be retained for a maximum period of 18 months from the date of acquisition, unless this period is extended where necessary to establish, exercise or defend a right in judicial or extra-judicial proceedings.

Rights of the data subject

With regard to your Data, you have the right to request CONAI, in the manner indicated in the Regulation and without prejudice to the provisions and limitations set out in Legislative Decree 196/2003 (Part I, Title I, Chapter III):

- **Right to access:** Article 15 of the Regulation allows you to obtain confirmation from the Data Controller of whether or not data concerning you is being processed and, where that is the case, to access such data.
- **Right to rectification:** Article 16 of the Regulation allows you to obtain rectification from the Data Controller of inaccurate personal data without undue delay. Given the purposes of the processing, you have the right to obtain completion of incomplete data, including by providing a supplementary statement.
- **Right to erasure:** Article 17 of the Regulation allows you to obtain erasure from the Data Controller of personal data without undue delay when one of the grounds provided by the Regulation applies.
- **Right to restriction:** Article 18 of the Regulation allows you to obtain restriction of processing from the Data Controller when one of the conditions provided by the Regulation applies.
- **Right to object:** Article 21 of the Regulation allows you to object at any time, on grounds relating to your particular situation, to processing of personal data under Article 6, paragraph 1, points (e) or (f), including profiling based on those provisions.
- **Right to portability:** Article 20 of the Regulation allows you to receive the personal data you have provided to a data controller in a structured, commonly used and machine-readable format, and to transmit such data to another data controller under the conditions provided by the Regulation.

All the rights listed above may be exercised by sending a communication to CONAI by email to privacy@conai.org or by registered letter to the operational office in Milan, Via Litta 5.

Complaints

If you believe that the processing of your Data infringes the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority, as provided by Article 77 of the Regulation.

Transfer to third countries

The Data is stored at CONAI's premises and on servers located within the European Union.

If a transfer of Data to third countries becomes necessary, such transfer will take place in compliance with the provisions of the Regulation and, in particular, where adequate safeguards are in place (adequacy decisions, standard contractual clauses approved by the European Commission, etc.).

Cooperation

Protection of your Data and compliance with the principles established by legislation, particularly the principle of transparency, are of primary importance to us. We would be grateful if you could help us by reporting any unclear parts of this document or suggesting improvements to the Legal and Corporate Affairs Division by writing to privacy@conai.org.

CONAI