

PRIVACY NOTICE - RECRUITING AND SELECTION

Information notice pursuant to Art. 13 of EU Regulation 2016/679 (“GDPR”)



1.WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?

The Data Controller is **ASE SPA** with registered office in Via Verdi, 33/35, San Giorgio su Legnano (MI) 20034 Italy, in person of its legal representative whom you can reach out to for any requirements writing to: privacy@ase-spa.com



2.MAIN DEFINITIONS

We remind you art. 4 GDPR sets the following definitions out:

- **Personal data:** any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity.
- **Particular data:** (cfr. art. 9 GDPR) data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the 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;
- **Data relating to criminal convictions, offences or security measures** (cfr. art. 10 GDPR): personal data revealing measures pursuant to art. 3.1, letters from a) to o) and r) to u) d.P.R. 14 november 2002, n. 313 in the field of criminal records, record of administrative sanctions grounding on crimes and related pending charges, or the quality of defendant or suspect pursuant to articles 60 and 61 of the code of criminal procedure.

3. PURPOSE OF PROCESSING, LEGAL GROUND, DATA RETENTION, NATURE OF CONFERRAL

 PURPOSE OF PROCESSING	 LEGAL GROUND	 DATA RETENTION	 NATURE OF CONFERRAL
A Staff recruitment activities: research and selection of personnel for the purpose of establishing an employment relationship, including different positions the data subject has directly applied for; retention of personal data for further selections campaigns; managing applications in response to job vacancies posted out on our website; interviews and any video-interviews (data processing including image / audio).	Execution of pre-contractual measures adopted on data subject's request art. 6 par. 1 lett. b) GDPR. For the processing of special categories of data, General Authorization No. 1/2016 from the Italian Data Protection Authority and any applicable regulations regarding mandatory hiring	Any personal data collected during the hiring process will be deleted as soon as it becomes evident that no job offer will be made or that the offer will not be accepted by the candidate. In any case, the maximum retention	Necessary for application management. Any lack will prevent the data controller to process the information for the purposes of research and selection of personnel.

 PURPOSE OF PROCESSING	 LEGAL GROUND	 DATA RETENTION	 NATURE OF CONFERRAL
		period is set at 24 months	
B Management of data subjects' requests, pursuant to art. 15 and following GDPR (data subjects' rights)	The processing is necessary to comply with a legal obligation the data controller is liable to (C45) Art. 6 par. 1 lett. c) GDPR	5 years after request' closure, except from any lawsuits	Data conferral is mandatory, being indispensable to grant the fulfilment of any legal obligations
C In the context of candidate selection activities, the Data Controller may consult the candidate's ' social profile ' on social media/networks. The Data Controller may collect and process the candidate's personal data to the extent that this collection is necessary and relevant for the performance of the job. For this purpose, candidates may be asked to provide information about their respective social network profile contacts	Data controller's legitimate interest , provided that interests or fundamental rights and freedoms of data subjects are not prevailing (C47-C50) Art. 6 PAR. 1 lett. f) GDPR	Any personal data collected during the hiring process will be deleted as soon as it becomes evident that no job offer will be made or that the offer will not be accepted by the candidate. In any case, the maximum retention period is set at 24 months	The provision of data is optional. In case of lack, the data the Data Controller would not achieve his legitimate interest as stated for in this purpose. The refusal shall be balanced with the aforesaid data controller's legitimate interest
D Management of information flows provided by the Model of Organization, Management and Control (MOGC) adopted in accordance with Legislative Decree 231/2001 aimed at preventing the liability of Entities for administrative offenses originating from crimes. Specifically, data will be gathered to facilitate the Supervisory Body in monitoring compliance with the MOGC.	The processing is necessary to comply with a legal obligation the data controller is liable to (C45) Art. 6 par. 1 lett. c) GDPR	Up to 10 years from the end of O.d.V.'s mandate	The provision of personal data is mandatory, as it is essential to fulfill legal obligations

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E In the context of personnel selection activities, references and resumes verification . These activities will be conducted: - at the educational/training institutes declared by the candidate and covering the attending period and the obtained degree/diploma; - from previous employers and covering the position held and the correspondence of the employment period the candidate declares.	Processing is based on consent to the processing of personal data (C42, C43) Art. 6 par. 1 letter a) GDPR.	Any personal data collected during the hiring process will be deleted as soon as it becomes evident that no job offer will be made or that the offer will not be accepted by the candidate. In any case, the maximum retention period is set at 24 months	The provision of personal data is optional. The lack of conferral does not prevent the selection process



4. WHO YOUR DATA WILL BE DISCLOSED TO? DATA RECIPIENTS

All the personal data may be disclosed to recipients acting as autonomous Data controllers or Data Processors (art. 28 GDPR) and processed by persons appointed to, pursuant to art. 29 GDPR and acting under the authority of the controller or the processor, upon written letter of authorizations relating to purposes and means of processing. Personal data may be disclosed to recipients belonging to the following categories:

- entities managing/supporting/assisting, even occasionally, the Data Controller in the administration of the Information System and telecommunication networks (including email, websites, and/or web platforms);
- companies within the scope of assistance, consultancy, and personnel selection;
- Individuals and members of the Supervisory Body (O.d.V.) 231/2001, based in Italy;
- In case of consent for references, to third-party entities, among which, Universities and Schools, former employers.
- Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors pursuant to Article 28 is available by writing to **EMAIL**



5. INTERNATIONAL DATA TRANSFERS

Personal data will not be transferred to third countries outside the EEA.



6. AUTOMATED-MEAN PROCESSING?

Personal data will be subjected to traditional and manual, electronic or automated processing. Fully automated decision-making processes are not carried out.



7. DATA SUBJECTS' RIGHTS

Data subjects may assert their rights as expressed in Articles 15 GDPR and following contacting the Controller at: privacy@ase-spa.com. The Data Controller ensures data subjects the possibility to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure of the same (Article

17), and restriction of processing (Article 18). The Data Controller communicates (Article 19) any rectifications, erasures, or restrictions of processing to each recipient to whom the personal data has been disclosed. The Data Controller informs the data subjects upon their request about such recipients.

The Data Controller ensures the right to data portability (Article 20) and, in the event of requests under Article 20, will provide data subjects with the data in a structured, commonly used, and machine-readable format. Data subjects are entitled the right to object (Article 21) at any time to the processing of data based on legitimate interest or the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller, by writing to the above contacts with the subject 'objection.' In the case of exercising the right to object to processing based on legitimate interest, the Data Controller acknowledges the data subjects to obtain, upon request, information about the balancing test performed. Data subjects are recognized the right to withdraw the consent given, without affecting the lawfulness of processing based on consent before the withdrawal.

If data subjects believe that the processing of personal data by the Data Controller violates any provision of UE Regulation 2016/679, they are free to lodge a complaint with the national supervisory authority, especially in the Member State where they habitually reside or work, or where the violation occurred (Italian Data Protection Authority - <https://www.garanteprivacy.it/>), or to take appropriate legal action.



8. UPDATES

The Data Controller retains the right to modify, update, add or remove some parts of this notice at any time.

Last review: 29/07/2026

Data controller

Verdi, 33/35
San Giorgio su Legnano (MI)
ASE SPA

Pursuant to art. 13 and 6 UE Reg. 2016/679 (GDPR),

- ☐ I Declare to have read the information notice provided by ASE SPA
- ☐ give my consent to purpose E) (collection of external references)