

NOTICE PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION NO. 2016/679

– APPLICANT –

SNATT LOGISTICA S.p.A., (Company Registration No. and VAT No.: 02060420359) (hereinafter “SNATT”), in the person of its current legal representative, with registered office at Via Kennedy, 12/b, Campegine (RE), acting as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation No. 2016/679 (GDPR), hereby informs you, pursuant to Articles 13 and 14 of the GDPR, that your personal data described in Article 1 below will be processed for the purposes set out in Article 2.

1. Categories of data subject to processing.

1.1. SNATT may collect and process, for the purpose of pursuing the processing objective described in Article 2, the following information about you, contained primarily within your curriculum vitae (CV) sent to or received by SNATT by any direct or indirect means (e.g. unsolicited application; physical delivery to premises associated with SNATT; internal referral by employees or similar staff of SNATT or companies directly or indirectly linked to it; referral by a so-called headhunter/staffing agency/employment agency, specifically appointed by SNATT; referral by local technical institutions, at the specific request of SNATT) or obtained/derived from further documentation provided, including spontaneously (e.g. short self-presentation video): **(i)** personal data pursuant to Article 4(1) of the GDPR (e.g. first name; surname; residential address/domicile/place of residence; photograph; professional and educational experience) (hereinafter “personal data”); **(ii)** where necessary, so-called special categories of personal data pursuant to Article 9(1) of the GDPR (with the exception of any genetic data pursuant to Article 4(13) of the GDPR, in accordance with paragraph 1.4.1.) letter d) of Provision No. 146 of 5 June 2019 signed by the Italian Data Protection Authority [web doc. No. 9124510]), which may be included in your CV and/or communicated by you to SNATT (e.g. membership of a so-called protected category) (hereinafter “so-called special categories of personal data”). In accordance with Article 14(2)(f) of the GDPR, SNATT specifies that the origin of the personal information described above may, where applicable, derive from the following sources: e.g. local technical college, upon specific request by SNATT; so-called headhunting/staffing agencies and/or employment agencies, specifically appointed by SNATT.

2. Purposes of processing and legal basis.

2.1. Your personal data and, where necessary, your so-called special categories of personal data are/may be processed by SNATT for the following processing purpose:

- a.** Recruitment/selection/assessment of a candidate for an employment relationship or similar.

In accordance with Article 13(2)(e) of the GDPR, SNATT specifies that any failure to provide (even partially, where necessary) your personal data and, where necessary, your so-called special categories of personal data may, in some cases, make it impossible for SNATT to carry out, correctly and fully, the processing purpose referred to in Article 2.1. point (a).

In this regard, SNATT specifies that the legal basis for the processing purpose referred to in Article 2.1(a) is found in the following regulatory provisions: Article 6(1)(b) and (c) of the GDPR, for your personal data; Article 9(2)(b) of the GDPR, Provision No. 146 of 5 June 2019 of the Italian Data Protection Authority (to be read in conjunction with Article 21(5) of Legislative Decree No. 101 of 10 August 2018), Article 113 of the amended Legislative Decree No. 196/2003 (Privacy Code), Article 8 of Law No. 300/1970 (Workers’ Statute), regarding your so-called ‘special categories’ of personal data.

3. Retention period.

3.1. In accordance with Article 13(2)(a) of the GDPR (and, where applicable, in accordance with Article 14(2)(a) of the GDPR), SNATT hereby informs you of the following retention periods/timeframes, at the end of which your personal data and any so-called ‘special category’ personal data will be subject to erasure, destruction or anonymisation: (i) for the purposes of processing referred to in Article 2.1(a): in the event of a successful outcome of the selection process: 10 years pursuant to Article 2946 of the Italian Civil Code, commencing from the definitive termination of the employment relationship or similar arrangement assigned by SNATT; this period may be extended in order to comply with a regulatory obligation (including one that has subsequently arisen) or to assert or defend a right or interest, including in court proceedings; in the event of a negative outcome of the selection process: generally, 1 year, starting from the date on which SNATT notifies you of the negative outcome (including in the form of so-called silence/refusal, following a reasonable period of time from the last job interview conducted by SNATT in relation to the position for which you applied) of the selection process in which you decided to participate: upon expiry of this period, SNATT reserves the right to ask you, in accordance with Recommendation CM/Rec (2015)5 of the Committee of Ministers to Member States, for your consent to the further (but predetermined) retention of your CV, in anticipation of future job opportunities.

4. Recipients.

4.1. In accordance with Article 13(1)(e) of the GDPR (and, where applicable, in accordance with Article 14(1)(e) of the GDPR), SNATT hereby informs you that your personal data and any so-called special categories of personal data may be disclosed, where appropriate and necessary, to one or more recipients pursuant to Article 4(9) of the GDPR, generally identified by category as follows: (i) for the purposes of processing referred to in Article 2.1. point (a): so-called authorised parties pursuant to Articles 4(10), 29 and 32(4) of the GDPR for processing by SNATT; subsidiaries/affiliates of SNATT, in accordance with Recital 48 of the GDPR; consultants/companies of various types and forms providing services directly or indirectly related to the full execution of the processing purpose referred to in Article 2.1(a) (e.g. employment agency).

5. Transfer.

5.1. Your personal data and any so-called special categories of personal data are/will be stored in automated, partially automated or non-automated files belonging to, or in any case attributable to, SNATT, even indirectly, and located within the European Economic Area (EEA). In the event that data is stored in fully or partially automated files potentially outside the EEA, SNATT hereby states that, in accordance with Article 13(1)(f) of the GDPR, it will comply with the safeguards set out in Chapter V of the GDPR.

6. Rights of the data subject.

6.1. In relation to your data described in Article 1 above, SNATT informs you of your right to exercise the following rights, which may be subject to the limitations set out in Articles 2-undecies and 2-duodecies of the Privacy Code: right of access under Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data concerning the data subject are being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purposes of processing, retention period); right to rectification pursuant to Article 16 of the GDPR: the right to correct, update or supplement personal data; right to erasure pursuant to Article 17 of the GDPR: the right to obtain the erasure, destruction or anonymisation of personal data, provided that the conditions set out in that Article are met; right to restriction of processing pursuant to Article 18 of the GDPR: a right with a distinctly precautionary nature, aimed at obtaining the restriction of processing where the circumstances governed by Article 18 apply; right to data portability pursuant to Article 20 of the GDPR: the right to obtain personal data provided to SNATT in a structured, commonly used and machine-readable format (and, where requested, to have it transmitted directly to another data controller), provided that the specific conditions set out in the same article are met (e.g. legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object pursuant to Article 21 of the GDPR: the right to obtain the permanent cessation of a specific processing operation involving personal data; right to lodge a complaint with the Supervisory Authority (i.e. the Italian Data Protection Authority) pursuant to Article 77 of the GDPR: the right to lodge a complaint where it is considered that the processing under review infringes national and EU legislation on the protection of personal data.

6.2. In addition to the rights described in Article 6.1 above, SNATT specifies that, in relation to your data described in Article 1 above, you have the right, where possible and relevant, to exercise, on the one hand, the (sub)right provided for in Article 19 of the GDPR ("The data controller shall inform each recipient to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and linked to the exercise of one or more rights regulated by Articles 16, 17 and 18 of the GDPR; on the other hand, SNATT specifies that, in relation to your data described in Article 1 above, you have the right, where possible and relevant, to exercise the right provided for in Article 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her"), subject to the exceptions provided for in paragraph 2 below.

6.3. In accordance with Article 12(1) of the GDPR, SNATT undertakes to provide the information referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language: such information shall be provided in writing or by other means, including electronic means, or, at the request of the data subject, shall be provided orally provided that the identity of the data subject is verified by other means.

6.4. In accordance with Article 12(3) of the GDPR, SNATT hereby informs you that it undertakes to provide information regarding the action taken in response to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any event, no later than one month from receipt of the request; this period may be extended by two months if necessary, taking into account the complexity and number of requests (in such cases, SNATT undertakes to inform the data subject of this extension and the reasons for the delay within one month of receiving the request).

6.5. The rights described above (with the exception of the right under Article 77 of the GDPR) may be exercised using the contact details set out in Article 7 below.

7. Contact details.

7.1. SNATT can be contacted at the following address: snattlogisticaspa@legalmail.it

7.2. The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by SNATT, is Gabriele Borghi, who may be contacted at the following address: dpo@snatt.it

Campegine (RE), 10 April 2025 (date of last update).

SNATT LOGISTICA S.p.A.

(represented by its current legal representative)