



Data Protection Management System

Doc. INF-DPMS.01A Rev. 01 of 26/10/2022
Classification: L1 – PUBLIC

CANDIDATES PRIVACY POLICY

Provided in accordance with Articles 12, 13, 14 and 26 of Regulation (EU) 2016/679

Co-owner companies in accordance with art. 26 of Regulation (EU) 2016/679



Ai Studio – Professional Association

Legal and operational headquarter
C.so Francesco Ferrucci, 112 - 10138 Torino (Italy)
VAT and Tax Code 04348600018



Ai ENGINEERING srl

Legal and operational headquarter
C.so Francesco Ferrucci, 112 - 10138 Torino (Italy)
VAT IT 06764910011
Tax Code/Company Register TO 01066850064
REA Code: TO – 632269



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Personal Data Management System

In compliance with Regulation (EU) 2016/679

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Document:

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Date: **26/10/2022**

Rev. **01**

1 DOCUMENT RECIPIENTS

This document is issued on a co-ownership basis by the companies **Ai ENGINEERING s.r.l.** and **Ai STUDIO – Professional Association** to individuals who provide their personal data by spontaneously sending their CVs or by proposing their application through companies or personnel selection services used by the co-owning companies.

2 PREMISE

In compliance with the guidance set forth in Regulation (EU) 2016/ 679 (hereinafter, “Regulation” or “GDPR”) regarding the processing and free movement of personal data, you have the right to know all information regarding the processing of your personal data in a clear and transparent manner.

3 DEFINITIONS

The definitions of the terms used in this policy are intended as per Article 4 of [Regulation \(EU\) 2016/679](#).

4 JOINT CONTROLLERS OF THE PROCESSING OF PERSONAL DATA

The following companies jointly decide on the purposes of data processing and how to handle applications and are Joint Data Controllers under Article 26 of the Regulations and will jointly operate on your personal data under the brand name **Ai GROUP**:



Joint owner No.1: Ai ENGINEERING s.r.l.

Registered office and operational headquarters:

C.so Francesco Ferrucci, 112 - 10138 Torino (TO)

VAT IT 06764910011 – Tax Code/Company Register TO 01066850064



Co-owner N.2: Ai STUDIO – Professional Association

Registered office and operational headquarters:

C.so Francesco Ferrucci, 112 - 10138 Torino (TO)

VAT and Tax Code IT 04348600018

4.1 Single point of contact established by the Joint Controllers



To the GROUP

Main processing office: C.so Francesco Ferrucci, 112 - 10138 Torino (TO)

e-mail: privacy@aigroup.it

Phone: +39 0115814511

PEC: aiengineering@legalmail.it or aistudio@legalmail.it

4.2 Data Protection Officer - DPO

None of the Joint Controller companies is required to appoint a DPO (Data Protection Officer) pursuant to Article 37 of the GDPR.

Each company that is a Joint Data Controller, also in accordance with Article 2-quaterdecies of Legislative Decree 196/2003 (so-called “Privacy Code”), has taken steps to appoint its own corporate Data Protection Coordinator with the task of supervising the compliance of processing and providing a single point of contact for data subjects.

The Data Protection Coordinators are at your disposal for any clarification or information regarding the processing of your personal data and to assist you in the possible exercise of the rights recognized to you by the Regulation.

In this regard, we inform you that you can exercise your rights against each data controller also individually.

To exercise your rights or request information regarding the processing of your personal data declared in this policy, you may contact the Data Protection Coordinators at the following email address: **privacy@aigroup.it**

5 OUR COMPANY POLICY ON THE PROTECTION OF PERSONAL DATA

The Joint Controllers have always been very careful about the security of the information they manage, with particular regard to information that may contain personal data (pursuant to former Article 4.1 GDPR) or special categories of personal data (pursuant to former Article 9 GDPR). For this reason, Ai GROUP companies have decided to adopt a common organizational model, defined as **Data Protection Management System** (hereinafter “DPMS” or “System”), also based on the guidelines of the ISO 27001 standards. Taking into account the operational context of the organizations, the supply chain requirements and the expectations of the interested parties, the System establishes Leadership and commitment of each Joint Controller, through the definition of organizational roles, internal and external responsibilities and authority of the individuals involved.



Within the DPMS, security objectives are identified and the actions necessary to achieve them are planned. Each Joint Controller company ensures the necessary resources and expertise for the purpose of constant and continuous improvement of the System over time, periodically verifying its scope and alignment with corporate purposes.

6 PURPOSE OF THE PROCESSING

Personal data contained in your application (e.g. CV), or collected during the selection process, will be processed exclusively for the following purposes:

ID	Description of the purposes, basis of lawfulness, origin of the data and duration of the processing
F1	<p>Purpose: <i>To manage, analyze, classify, evaluate and select applications and carry out the selection for the possible establishment of an employment and/or collaboration relationship.</i></p> <p>Lawfulness: These treatments will be carried out in accordance with Article 111 BIS of Legislative Decree 101/2018 and Article 6 par. 1 letter b) as they are pre-contractual measures necessary to activate the employment contract. This is the legal basis used when your personal data are necessary for the execution of the contract to which you are a party or for the execution of all pre-contractual measures adopted at your request. For the treatments considered in this information, reference is made exclusively to the Employment Contract.</p> <p>While this is not the legal basis normally used for the processing of your data referred to in this policy, we may sometimes request your consent under Article 6.1 letter a) of the GDPR for some specific purposes. In this case, you will be promptly informed in writing and have the right to withdraw your consent at any time.</p> <p>Origin of data: Data are voluntarily and directly provided by you in CVs, during interviews or acquired by us from third parties (e.g. selection companies).</p> <p>Duration of processing: Processing will cease at the end of the selection process or within 36 MONTHS of receiving your application (e.g. CV). However, the data may be further processed if you are deemed suitable for possible future job positions.</p> <p>Further retention: If deemed appropriate and lawful, at the end of the processing duration, your personal data may be further retained for civil or judicial reasons (see purpose F3).</p>
F2	<p>Purpose: <i>To fulfil legal obligations, regulations arising from EU legislation, or arising from instructions given by public authorities or supervisory bodies.</i></p> <p>Lawfulness: These processing operations are carried out as a result of legal obligation under Article 6 par. 1 letter c) of the GDPR.</p> <p>Origin of data: The data is conferred for F1 purposes.</p> <p>Duration of treatment: The treatment will cease when the legal obligation expires.</p> <p>Further retention: In accordance with the retention period imposed by law, if deemed necessary and lawful, your data may be further retained for civil or judicial reasons (see purpose F3).</p>
F3	<p>Purpose: <i>To take protective actions to protect the interests of the Company or those of third parties such as, for example, exercising legal defense and/or asserting rights.</i></p> <p>Lawfulness: <i>These processing operations are carried out in accordance with Article 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.</i></p> <p>Origin of data: The data subject to retention processing are conferred or collected for all the purposes stated in this document.</p> <p>Duration of treatment: Until the protection purposes are fulfilled.</p> <p>Further retention: We will retain your personal data for the prescriptive period provided by the legislation for the protection of related rights, subject in any case to longer retention periods provided by specific sector regulations. Specifically, the data will be processed and/or retained for a period of 10 (ten) years from the achievement of the purposes of collection.</p>



Purpose: *Anonymization for internal analysis and statistical purposes.* In some circumstances, for processing for F1 purposes we may anonymize some data so that it can no longer be associated with your person, in such cases it will be possible for us to use such data without further notice to you and retain it indefinitely. We will only carry out anonymization if we are able to ensure and demonstrate over time that we cannot associate such data with your person again (e.g., through Reverse Engineering techniques).

F4 For example, the data may be used to process labor market statistics, quality, security, access to services, etc. Should the use of your anonymized data be required to feed statistics that may fall outside of your legitimate expectations, we will be responsible for providing you with specific information and collecting your consent if necessary.

Lawfulness: This anonymization processing will be carried out in accordance with Article 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Data Controller.

Origin of data: The data is collected for the purposes **F1**

Duration and Retention: We will retain and use anonymized data indefinitely.

6.1 FURTHER TREATMENTS

If, during the selection process, further and specific processing, not indicated in this notice, should become necessary, it will be the responsibility of the Contractors to provide you with specific information in advance and, if applicable, to proceed to acquire the necessary consent. This principle will also be applied if the processing of special categories of data (ex art. 9 of the GDPR) or the processing of personal data relating to criminal convictions and offenses (ex Article 10 of the GDPR) is necessary and lawful if this is required by law.

7 PERSONAL DATA SUBJECT TO PROCESSING

7.1 Common data

You should be aware that the Data Controllers may record, store and use the following information about or referable to you:

- *Personal Identifiers* such as title, name, date of birth, age, gender, residence, personal *email*, telephone number, as well as, if necessary, tax code, identity card number, driving license number, passport;
- *Curriculum Vitae (CV)* which will include information about your educational background and details such as qualifications, academic data, schools, training and professional skills;
- Data of a special nature (e.g. data relating to your health condition) freely entered by you in the *CV* or otherwise disclosed by you;
- *Additional information* necessary for selection and as consistent as you might reasonably expect by virtue of the job title sought.

7.2 Special categories of data

Some personal data processed may belong to special categories of personal data ("*data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or genetic or health-related data*" - Art. 9 of the GDPR).

Gradually with respect to the selection process, we may, in particular, process data related to disability conditions (possible registration in the targeted employment) to assess your suitability for work and to ensure compliance with the provisions of Law No. 68 of March 12, 1999.

The processing of such data will take place in compliance with the prescriptions contained in the Authorization for the processing of sensitive data in the employment relationship (No. 1/2016) updated to the Provision of the Guarantor Authority of December 13, 2018 ("*Provision identifying the prescriptions contained in the General Authorizations that are compatible with the Regulations and Legislative Decree No. 101/2018 of adaptation of the Code*" - Web Doc. No. 9068972).

7.3 Information relating to criminal convictions

We will only collect information relating to criminal convictions where this is appropriate given the nature of the role and where such an investigation is permitted by law.

8 PRINCIPLES APPLICABLE TO DATA PROCESSING

From the stage of collection of information, any processing carried out by us will respect the principle of relevance and non-excessiveness by virtue of the purposes pursued by the same. We would like to inform you that access to your personal



data by the persons we appoint, is permitted only if the knowledge is considered strictly essential to the pursuit of the purposes outlined in this document.

9 MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

For the stated purposes of this information notice, the provision of personal data is a necessary requirement and any refusal on your part to provide the requested information could totally or partially prevent the performance of activities aimed at the conclusion of the selection process, i.e. the fulfillment of legal obligations, regulations arising from EU legislation, or arising from instructions issued by public authorities or supervisory bodies. By way of example, Ai GROUP companies may be prevented from selecting you as a candidate to fill the required role.

10 MORE INFORMATION ON STORAGE

The CVs and data collected during the selection process will be deleted/destroyed or made anonymous within **90** days of the expiry of the declared retention periods.

11 DATA PROCESSING METHODS

We inform you that with logics strictly related to the purposes of collection, the Contracting Companies adopt and observe strict procedures and security measures to store, use and allow you to view your personal data by means of paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or illegal processing and from accidental loss, destruction or damage. In particular, your data are:

- collected exclusively for the stated purposes and subsequently processed in accordance with those purposes;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- accurate and, if necessary, updated, deleted and/or corrected, also according to your possible indications;
- used and kept for a period of time not exceeding the achievement of the purposes for which they are collected;

11.1 Automated decisions



In order to select applications, the Joint Controller companies do not implement automated decisions based on your personal data.

11.2 Safety



Ai GROUP companies have taken steps to identify the risks to the rights and freedoms of the candidate subjects, taking into serious consideration also the risks looming over the IT systems used. The risks were subsequently treated by analyzing the sources of risk and mitigating the threats capable of materializing them.

12 SCOPE OF DATA COMMUNICATION AND DISSEMINATION

For the pursuit of the purposes stated in this document and within the limits of what is strictly necessary, each company of Ai GROUP makes use of the activities of external parties with whom special agreements on the processing of personal data are entered into to regulate the relations of Ownership/Responsibility under the Regulations (e.g., external parties that carry out technical, commercial, legal, administrative consulting activities, companies that provide Cloud IT services, data processing, shipping and transportation services, banks, agencies, public administrations, authorities, supervisory bodies, etc.).

Internally, individuals involved in the processing activities of your personal data are bound to confidentiality, properly trained and appointed as "**Authorized**" subjects for processing.

Subject to any legal obligations, **your personal data will not be disseminated in any way.**

For more information about the entities that may become aware of your personal data, you may contact the Company's Data Protection Coordinators through the contact information we have provided in Section 4 of this policy.

13 TRANSFER OF DATA ABROAD

Normally, to carry out the application selection process, Ai GROUP companies do not transfer candidates' personal data outside the European Economic Area (EEA). However, if your personal data were to be transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions from the European Union Commission, each Contractor will ensure that appropriate safeguards are in place to protect its candidates' personal data in these countries.



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Some of the safeguards that might be adopted, where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymization, and if possible, encryption of the data itself.

By way of example but not limited to, we inform you that the transfer abroad of your personal data may be related to the use of cloud technologies, digital communication systems, security software and protection of IT services. In these cases, each Co-owner company undertakes to use services chosen from operators that guarantee higher standards of security and attention to the protection of personal data.

In this regard, we would like to inform you that Ai GROUP uses some ICT services, provided by US companies such as Microsoft, Google, Apple who act as our Data Processors according to art 28 of the GDPR.

For this reason, we have signed service contracts and "Data Processing Agreements" (DPAs) with these companies, which also include the "Standard Contractual Clauses" (SCCs) established by the European Commission pursuant to art. 46(1) GDPR.

However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow U.S. authorities access to our data as a result of the so-called "Cloud ACT."

14 RIGHTS OF THE INTERESTED PARTY

As a data subject, you may at any time exercise the rights granted to you by Articles 15 to 22 of the Regulations.

In particular, in the manner and within the limits of the law, you have the right to request from our Company for access to your personal data, rectification, cancellation or restriction of the processing of personal data concerning you and to object to their processing. You may use the contact channels provided in this document to exercise your rights.



You can obtain further information on the rights applicable to the processing stated in this notice in [ANNEX A](#).

15 COMPLAINT TO THE SUPERVISORY AUTHORITY (art. 77 GDPR)

Without prejudice to the possibility of contacting Ai GROUP to obtain any information or to exercise your rights, we inform you that you may lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you normally reside, where you work, or where you believe an alleged violation of the law on the protection of your personal data has occurred. In the Italian territory, you may file a complaint with the Italian Data Protection Authority. For information on how to submit your complaint to the authority you can use the following contact details:



Italian Data Protection Authority

Phone Number: +39 06.696771

E-mail address: guarantor@gpdp.it

PEC address: protocollo@pec.gpdp.it

Website: <https://www.garanteprivacy.it>

16 INFORMATION UPDATE

This policy, INF-DPMS.01A "CANDIDATES PRIVACY DISCLOSURE" Rev. 01 effective 10/26/2022, supersedes the previous one issued on 05/25/2018. The document is revised periodically according to regulatory and/or company changes. In case of changes in its fundamental parts (such as purposes, modalities, to whom we communicate the data, where we transfer them, etc.) it will be the responsibility of our Company to inform the candidate of the change.



You can find the updated version of this policy on Ai GROUP's institutional corporate website at the following link: <https://aigroup.it/privacy>

ATTACHMENT A

GUIDE TO THE EXERCISE OF RIGHTS APPLICABLE TO THE PROCESSING DECLARED IN THE CANDIDATE INFORMATION NOTICE INF-DPMS.01A VER. 2 OF 26/10/2022



RIGHT OF ACCESS (art. 15 GDPR)

As a data subject, you have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the following information:

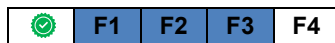
1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
4. when possible, the expected period of retention of personal data or, if this is not possible, the criteria used to determine this period;
5. the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing
6. the right to lodge a complaint with a supervisory authority;
7. if the data have not been provided directly by you, all available information about their origin;
8. the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic used, as well as the consequences of such processing for you;
9. if your personal data are transferred to a third country or international organization, you have the right to be informed of the existence of adequate safeguards in accordance with Articles 45-50 of the GDPR.



Your right to obtain a copy of the data will only be allowed if it can be done without infringing on the rights and freedoms of others. Should you decide to exercise this right, we will provide you with a copy of the personal data being processed. **If you request additional copies, we may charge you a fee based on the administrative costs we incur.**

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its basis of lawfulness. Specifically:



Conditions of non-applicability

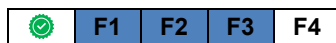
- The right does not apply to data already anonymised for **F4 purposes**

RIGHT TO RECTIFICATION (ART. 16 GDPR)

You have the right to obtain from us the modification and updating of your personal data without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of your incomplete personal data, including by providing us with a supplementary declaration.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its basis of lawfulness. Specifically, it is applicable to the following treatments:



Conditions of non-applicability

- The right does not apply to data already anonymised for **F4 purposes**

RIGHT TO CANCELLATION «RIGHT TO BE FORGOTTEN» (art. 17 GDPR)

You have the right to obtain the cancellation of personal data concerning you without undue delay.

Conditions of applicability

We grant this right for the following treatments, when one of the following reasons exists:



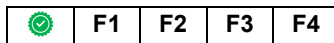
1. when the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed:



Specific conditions of non-applicability

- The right does not apply to data already anonymised for **F4 purposes**

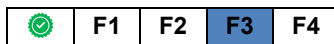
2. where you have withdrawn the consent on which the processing is based and there is no other legal basis to continue it in the absence of your authorization. The right does not apply to any of the processing declared in this notice.



Specific conditions of non-applicability

- The right is not applicable as none of the processing declared in the information is based on the consent of the data subject.

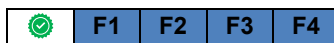
3. if you object to the processing and there are no legitimate grounds for us to continue with the processing anyway:



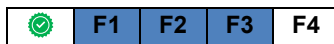
Specific conditions of non-applicability

- The right does not apply to the processing carried out for **F1** and **F2** purposes as they are not based on legitimate interest and to data already anonymised for **F4** purposes

4. if the personal data were processed unlawfully:



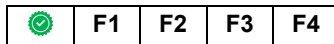
5. where personal data must be erased to comply with a legal obligation to which we are subject as Data Controllers:



Specific conditions of non-applicability

- The right does not apply to data already anonymised for **F4 purposes**

6. where the personal data have been collected in relation to the offer of information society services.



Specific conditions of non-applicability

- The right does not apply to any of the treatments stated in this notice.

RIGHT OF LIMITATION OF THE TREATMENT (art. 18 GDPR)

This right is guaranteed for all processing by us regardless of the lawful basis used.



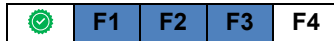
Personal data subject to limitation, are processed, except for storage, only with your consent or for the establishment, exercise or defense of a right in court or to protect the rights of another natural or legal person. In addition, we inform you that if you have obtained a restriction of processing, you will be informed by the data controller before the restriction is lifted.

Conditions of applicability

You have the right to obtain the limitation of processing when one of the following applies:



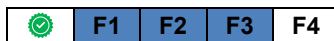
1. You have disputed the accuracy of your personal data; the restriction will be applied for the period necessary to allow us to verify the accuracy of such data:



Specific conditions of non-applicability

The right does not apply to data already anonymised for **F4 purposes**

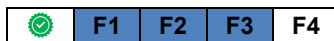
2. the processing is unlawful and you object to the deletion of your personal data by requesting instead that their use be restricted



Specific conditions of non-applicability

The right does not apply to data already anonymised for **F4 purposes**

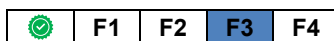
3. although we no longer need it for processing purposes, the personal data is necessary for you to establish, exercise or defend a right in court



Specific conditions of non-applicability

The right does not apply to data already anonymised for **F4 purposes**

4. You have objected to the processing; the restriction will be applied pending verification as to whether our legitimate grounds for its continuation prevail



Specific conditions of non-applicability

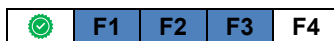
The right does not apply to data already anonymized for **F4 purposes** and to processing carried out for **F1** and **F2 purposes** as they are not based on legitimate interest.

RIGHT TO NOTIFICATION (art. 19 GDPR)

You have the right to obtain direct communication from us to each of the recipients to whom your personal data have been transmitted, regarding your requests for rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, if you consider it appropriate, you have the right to obtain a list of the recipients of your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawful basis used.



Specific conditions of non-applicability

The right does not apply to anonymised data for **F4 purposes**

RIGHT TO DATA PORTABILITY (art. 20 GDPR)

You have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you provided to us and you have the right to obtain from us the direct transmission of such data to another Data Controller if technically feasible.

Conditions of applicability

This right is only guaranteed for processing that has consent or contract as its legal basis and is carried out by automated means.



	F1	F2	F3	F4
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Specific conditions of non-applicability

- The right does not apply to the processing carried out by us

RIGHT TO OBJECT (art. 21 GDPR)

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.



We will only refrain from further processing your personal data if we are unable to demonstrate the existence of legitimate reasons overriding your interests, rights and freedoms. Processing will continue even if the data are necessary for the establishment, exercise or defense of a right of ours or of third parties in litigation.

Conditions of applicability:

The legal basis for processing must be legitimate interest. The right is applicable to the following processing:

	F1	F2	F3	F4
--	----	----	----	----

Specific conditions of non-applicability

- The right does not apply to the processing carried out for **F1** and **F2** purposes as they are not based on legitimate interest and to the processing carried out for **F3** purposes as they are necessary for the ascertainment and defense in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATIC DECISION-MAKING PROCESSES (ART. 21 GDPR)

You have the right not to be subjected to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or significantly affects you in a similar way. In addition, you have the right to obtain human intervention from the Controller, to express your opinion and to challenge the automated decision. In any case, decisions must not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) of the GDPR applies and appropriate measures are in place to protect your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:

- is necessary for the conclusion or performance of a contract between us;
- is based on your explicit consent.
- the decision is authorised by Union or Member State law.

	F1	F2	F3	F4
--	----	----	----	----

Specific conditions of non-applicability

- The right does not apply to any of the processing operations stated in this notice as none of them subjects the data subject to a decision based solely on automated processing.

RIGHT TO COMPENSATION FOR DAMAGES (art. 82 GDPR)

We inform you that anyone who suffers material or immaterial damage caused by a violation of Regulation (EU) 2016/679 has the right to obtain compensation for such damage.

FORMS FOR THE EXERCISE OF RIGHTS

To exercise your rights towards the Joint Controller companies, we recommend that you use the following form made available to you by the Data Protection Authority. We remind you that your identification is always necessary on our part.
<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>



Personal Data Management System
In compliance with Regulation (EU) 2016/679

CANDIDATES PRIVACY POLICY

Provided in accordance with Articles 12, 13, 14 and 26 of Regulation (EU) 2016/679

Document:
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Rev. **01**

End of Document