

PRIVACY NOTICE

Pursuant to applicable data protection legislation (“**Data Protection Law**”) - namely the EU Regulation 2016/679 (the “**GDPR**”) of the European Parliament and of the Council, dated 27 April 2016, the Data Protection Act 2018 and any other existing or future legislative acts or provisions implementing and adopting the GDPR in the United Kingdom, Italy and France, this Privacy Notice sets out how *Macchi di Cellere Gangemi*, as “data controller”, decides to hold and use personal information collected about candidates (“you”) when applications to work with us are made. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

We will comply with **data protection law and principles**, which means that your data will be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

In connection with your application for work with us, we will collect, store, and use the **following categories of personal information** about you:

- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history and qualifications;
- The information you have provided to us in your curriculum vitae and covering letter, if any; and
- Any information you provide to us during an interview.

We **collect personal information** about candidates only if directly from you.

We will **use the personal information** we collect about you to:

- Assess your skills, qualifications, and suitability for working with us;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Comply with legal or regulatory requirements and;
- Keep records related to our hiring processes.

It is in our legitimate interests to process your personal information to decide whether to offer you a position with us or not, since it would be beneficial to our business to offer you such position.

We also need to process your personal information to decide whether to enter into a contract with you: having received your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you a position with us. If we decide to make an offer to you, we will then take up references and/or carry out any other check before confirming your appointment.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

We do not envisage that we will process **information about criminal convictions**, and we will inform you if otherwise.

You will **not** be subject to decisions that will have a significant impact on you based solely on **automated decision-making**.

We will only **share your personal information** with other members of *Macchi di Cellere Gangemi* for the purposes of processing your application. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with

our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We have put in place **appropriate security measures** to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents and consultants on a business need-to-know basis. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected **data security breach** and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We will **retain your personal information** for a period of 6 months after we have communicated to you our decision about whether to offer you a position with us. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Under certain circumstances, by law you **have the right to:**

- **Request access** to your personal information (commonly known as a “data subject access request”), in order to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you, to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information, asking us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information, asking us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact recruiting@macchi-gangemi.com.

You have the right to make a complaint at any time to the competent supervisory authority for data protection issues, which is: Information Commissioner’s Office (ICO) for the UK; Garante per la protezione dei dati personali (Garante Privacy) for Italy; and Commission Nationale de l’Informatique et des Libertés (CNIL) for France.

If you have any questions about this privacy notice or how we handle your personal information or you want to withdraw your application, please contact the department responsible for recruiting at recruiting@macchi-gangemi.com.

