

## INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA IN PERSONNEL SELECTION PROCEDURES

Hub Innovazione Trentino Fondazione informs that, in order to select professional figures to be included in its staff and, in any case, in order to make it possible to submit spontaneous applications, it offers the possibility to reply to search ads published on the company's web portal or to submit one's curriculum vitae.

Hub Innovazione Trentino Fondazione, for the purposes set out above, may ask candidates to provide any data useful for the assessment of their suitability to fill the professional roles for which the search is carried out.

In view of the above, pursuant to Articles 12 et seq. of the EU Regulation 2016/679 ("GDPR" or "Regulation"), and in general in compliance with the principle of transparency set out in the Regulation itself, we hereby provide the following information regarding the relevant processing of personal data (i.e. any information concerning an identified or identifiable natural person: "Data Subject").

### 1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller (i.e. the person who determines the purpose and means of processing of personal data, "Controller") is Hub Innovazione Trentino Fondazione, based in Piazza Mancini, 17, 38123 Povo (TN), tel. +39 0461 314057, PEC: [hubinnovazione@pec.it](mailto:hubinnovazione@pec.it). For contacts specifically relating to the protection of personal data, including the exercise of the rights referred to in point 7 below, we indicate in particular the e-mail address [info@trentinoinnovation.eu](mailto:info@trentinoinnovation.eu) to which you may address any requests.

The Data Controller has appointed the Data Protection Officer ("DPO"), pursuant to Article 37 of the Regulation. The DPO can be contacted through the following dedicated channel: [privacy@trentinoinnovation.eu](mailto:privacy@trentinoinnovation.eu)

### 2. FINALITÀ DEL TRATTAMENTO TIPOLOGIA DI DATI TRATTATI, CONSEGUENZE DEL MANCATO CONFERIMENTO DEI DATI, BASE GIURIDICA DEL TRATTAMENTO DEI DATI

The purpose of the processing is to select the figures to be included in the workforce and assess that they are in line with the Controller's needs. To this end, the Data Controller may ask candidates to enter their CV and any other necessary information on the aforementioned website. Candidates, for the same purposes, may enter their CVs on their own initiative on the website.

Please include in your CV only information relevant to the purpose of selection. In particular, please limit health-related information to what is strictly necessary to inform the potential employer of your membership of protected categories.

The provision of the requested data is optional. However, failure to provide the data will not allow the interested party to reply to the Controller's advertisements, or to submit a spontaneous application and thus participate in the personnel selection process set up by the Controller.

The processing of data finds its legal basis in the fact that it is necessary to carry out pre-contractual measures within the framework of the selection procedure to which the data subject has adhered or has promoted by spontaneously sending a curriculum vitae.

In the case of data falling into the special categories referred to in Art. 9 of the Regulation prior to the establishment of the employment relationship (i.e. personal data revealing racial or ethnic origin, political opinions, philosophical or religious beliefs, trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning the health or sex life or sexual orientation of the person), the explicit consent of the data subject is required, which the latter may express through the procedure on the site when sending his/her curriculum vitae.

### 3. PROCESSING MODALITIES AND RETENTION PERIOD

Processing will be carried out:

- Through the use of manual and automated systems;
- by entities or categories of authorized people in order to fulfil their duties,
- with the use of appropriate measures to ensure the confidentiality of data and to avoid access to them by unauthorised third parties.

The retention of data following the possible establishment of the employment relationship will follow the

course of the personnel file and therefore for the entire duration of the relationship and, upon its termination, for a period no longer than is necessary to fulfil the obligations or tasks connected with the relationship, with gradual deletion of data attributable to specific needs that are no longer pursued. In any case, full information on the processing of employee data will be provided at the time of any recruitment.

In the event that the selection procedure does not lead to recruitment, processing will cease once this decision has been made, and in any case within 6 months of sending the curriculum vitae, unless the candidate - at the request of the Data Controller in particular cases - consents to processing for a longer period.

There are no automated decision-making processes.

#### 4. RECIPIENTS OF PERSONAL DATA

In addition to the subjects belonging to the Controller's corporate organisational structure (e.g. employees and collaborators), authorised according to the relevance of their functions with the relevant processing operations, the data collected and processed may be accessed, under the conditions set by the Controller and in their role as Data Processors, by subjects carrying out IT services, including those relating to backup and cloud storage.

The updated list of subjects designated as Data Processors pursuant to Art. 28 GDPR can be requested from the contact details of the Data Controller indicated above.

Prior to the conclusion of the contract, the Data Subject may undergo a medical examination to verify his or her suitability for the duties and in this case the personal data may be communicated to the appointed doctor. The data will not be disclosed.

#### 5. LOCATION OF DATA PROCESSING

The processing activity is carried out on the territory of the European Union.

#### 6. DATA COMMUNICATION

The data collected and processed, i.e. the content of the recordings, may be communicated, exclusively for the purposes specified above, only to the judicial or police authorities who make a request or in the event of the occurrence of unlawful acts that need to be investigated.

The Data Controller makes use of suppliers for the management and maintenance of the video surveillance system, who, if even potentially authorised to access the data, are designated as Data Processors pursuant to Art. 28 GDPR and whose updated list can be requested from the contact details of the Data Controller indicated above.

#### 7. RIGHTS OF THE INTERESTED PARTY

The GDPR gives the person concerned the exercise of the following rights with reference to the personal data concerning him/her (the summary description is indicative, the complete statement of the rights can be found in the Regulation, in particular in Artt. 15-22):

Right to access to personal data (Art. 15): It tells whether a processing of personal data is in progress or not; if it is in progress, the person concerned has the right to obtain, inter alia, the access to such data and information regarding the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the data has been or will be communicated.

Right to rectification of personal data (Art. 16): (i) Correction of inaccurate personal data of the interested party without undue delay and (ii) integration of personal data, if they are incomplete.

Right to erasure («right to be forgotten») (Art. 17): Cancellation of personal data concerning the interested party without undue delay (the Data Controller is obliged to cancel the personal data without undue delay in the cases provided for in Art. 17 of the Regulation).

Right to restrict processing (Art. 18): In certain cases – objecting the accuracy of the data, during the time required for verification; objecting the lawfulness of processing with opposition to the erasure; need of using the data for the rights of defence of the interested party, while they are no longer useful for the processing; if there is objection to the processing, while the necessary verifications are carried out – the data will be stored in such a way in order to be able to be restored, but, in the meantime, they are not available to the Controller except in relation to the validity of his/her restriction request or with the consent of the person concerned or

for the assessment, exercise or defence of a right before the courts or to protect the rights of other natural or legal persons or for reasons of relevant public interest of the Union or of a Member State.

Right to data portability (Art. 20): If the processing is based on consent or on a contract and is carried out by automated means, on request, the interested party will receive his/her personal data in a structured format, in common use and readable by an automatic device and he/she may transmit them to another Controller, unimpeded by the Controller which has provided them and, if technically feasible, he/she can obtain that such transmission is made directly by the latter.

Right to object to processing carried out pursuant to Article 6(1)(e) or (f) (Art. 21): Opposition in whole or in part to the processing carried out on the basis of legitimate interest, for reasons related to the particular situation of the person concerned.

Should the processing be carried out by virtue of the consent expressed by the person concerned, then for the processing activities covered by this information with regard to the special categories of personal data and, where applicable, the consent to the processing for periods exceeding six months, the interested party can withdraw the consent at any time without prejudice to the lawfulness of the processing which took place before the withdrawal of the consent.

The person concerned has also the right to complain to the supervisory authority (Garante per la Protezione dei dati personali) if he/she considers that the processing concerned infringes the requirements of the Regulation; the supervisory authority is contactable through the contact details indicated on the site of the Authority "[www.garanteprivacy.it](http://www.garanteprivacy.it)". In any case, we would like to have the opportunity to address in advance any doubts of the interested parties, who can contact the e-mail address [info@trentinoinnovation.eu](mailto:info@trentinoinnovation.eu) or other contact details of the Controller or DPO indicated above for any clarification concerning the processing of their personal data and for the exercise of their rights.