

## APPLICANT POLICY

### PRECONDITIONS

**Why this document?** National and international legislation on personal data protection require that the data subject is informed on personal data that are processed and on who will process them, in order to guarantee that the processing will be fair and transparent.

Hereinafter we will therefore see clearly listed **who** will process your data, **which** personal data will be processed, **the purposes** for which the personal data will be processed, **for how long** the data will be processed, which are **your rights** and **how to exercise them**.

**Which laws are referred to in this document?** The policy is offered by taking in conjunction with:

- The General Data Protection Regulation (GDPR) EU n. 2016/679 (hereinafter the "Regulation")
- Italian Legislative Decree n. 196/2003 as amended by the Legislative Decree n. 101/2018 (hereinafter "Code")
- Italian Legislative Decree n. 81/2008 on job security

### POLICY

#### 1) DATA CONTROLLER

Teddy S.p.A., via Coriano n. 58, Grosrimini, blocco 97, 47924 Rimini (RN), Tel. (+39) 0541 301411, Fax (+39) 0541 383430, E-mail [privacy@teddy.it](mailto:privacy@teddy.it)

#### 2) PURPOSES, LEGAL BASIS, STORAGE RETENTION PERIOD AND NATURE OF THE PROCESSING

Personal data, depending on the actions carried out by the data subject, will be processed for the following purposes:

- Unsolicited application: move forward the verification of the necessary skills for the assumption or for the beginning of a new working cooperation with the Company, as well as for purposes connected or instrumental in carrying out research and selection activities of the applicants
  - The legal basis of this process is the need to perform pre-contractual measures adopted upon request of the applicant;
  - The retention period of personal data processed for this aim is three months;
  - The provision of personal data is optional, anyway the eventual rejection will determine the inability to carry out the activity of personnel selection by preventing the application from being taken into account for the establishment of a possible working relationship
- Unsolicited application through the portal [www.teddycareers.it](http://www.teddycareers.it): move forward the verification of necessary skills for the assumption or for the beginning of a with the Company, as well as for purposes connected or instrumental in carrying out research and selection activities of the applicants
  - The legal basis of this process is the need to perform pre-contractual measures adopted upon request of the applicant;
  - The retention period of personal data processed for this aim is all the contract period related to the subscription into the portal [www.teddycareers.it](http://www.teddycareers.it) and, anyway, not exceeding in five years; in case of litigation, the retention period of personal data processed for this aim is for the whole duration of it, until all the appeal actions terms will be exhausted;
  - The provision of personal data is optional, anyway the eventual rejection will determine the inability to carry out the activity of personnel selection by preventing the application from being taken into account for the establishment of a possible working relationship.
  - Additional information related to the processing is available into the privacy policy of the portal [www.teddycareers.it](http://www.teddycareers.it).

#### 3) PERSONAL DATA PROCESSED

By processing personal data we mean any operation or a set of operations, performed with or without the aid of automated processes and applied to personal data or a set of personal data, as the recollection, the registration, the organization, the structure, the retention, the trend or change, the exfiltration, the consultation, the use, the communication through the transmission, spread or any other form available, the comparison or the interconnection, the limitation, the deletion or the disruption.

The personal data collected are personal, contact and curricular (or related to training and professional experience) of the candidate. They could also be sent by the data subject to the Data Controller, pursuant to Article 9 of the Regulation, such as "special categories of personal data" that are data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data relating to the health or sexual life or sexual orientation of the person. Pursuant to *article 111-bis* of the Code, consent is not required for the processing of personal data contained in the curriculum spontaneously transmitted to the Data Controller as the processing is necessary for the execution of a contract to which the data subject is a party or for the execution of measures pre-contractual adopted at its request.

Further processing, categories of particular data by the Data Controller, will be carried out only with prior and explicit consent.

#### **4) RECIPIENT OF PERSONAL DATA**

Personal data might be shared, for specific purposes, with:

- Subjects acting as "Data Processors", according to the Article n. 28 of the Regulation namely, people, companies or professionals who provide assistance and advisory activities to the Data Controller in connection with the provision of goods/services;
- Subjects with which is necessary to interact for the goods/services provision, as independent Data Controller;
- Subjects, bodies or Authorities whom the communication of data is mandatory by legal provisions or orders from the Authorities;
- Personnel expressed authorized by the Data Controller, necessary to carry out activities strictly related to the provision of goods/services, which are undertaken to confidentiality or are legally bound to do so and that have received opportune operational instructions, pursuant to article 29 of the Regulation.

The full list of Data Processors is available by sending a written request to the Data Controller.

#### **5) TRANSFERS OF PERSONAL DATA**

Some of your personal data are shared with recipients who could be out of the European Economic Area (EEA). The Data Controller ensures that the processing of your personal data is carried out according to the Regulation. Verily, transfers shall be based on an adequacy decision or on Standard Contract Clauses approved by the European Commission. Further information is available at the Data Controller.

#### **6) EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING**

The Data Controller does not adopt an automated decision-making process on personal data, including the profiling, referred to in Article 22 of the Regulation. Further information will be available at the Data Controller.

#### **7) DATA ABOUT PEOPLE UNDER 18 YEARS OLD**

The subscription of information services company, like the subscription to newsletter (direct marketing), profiling, the subscription to the loyalty program, shall be carried out by the holder of the parental responsibility by the subscription of the written filling form. The Data Controller will not be responsible for possible recollection of personal data, as well as false statements.

#### **8) RIGHTS OF DATA SUBJECT**

Data subject has the right to obtain from the Data Controller, in certain specific cases, the access to personal data and the rectification or the erasure of the same or the restriction of the processing or to the right to object to the processing (Article 15 and following of the Regulation). The appropriate petition to the Data Controller shall be presented by contacting the e-mail designed for the feedback to the data subject or by filling the form available in the dedicated privacy section.

#### **9) RIGHT TO COMPLAIN**

The data subject that believes that the processing of personal data is taking place in breaching of the provisions of the Regulation, shall have the right to lodge a complaint to the Italian Data Protection Authority ([www.gdpr.it](http://www.gdpr.it)), as required by the article 77 of the Regulation, or bring the issue before the competent courts (article 79 of the Regulation)

#### **10) HOW TO EXERCISE YOUR RIGHTS**

In order to exercise your right, you shall access to the Privacy Area of the website [www.teddy.it](http://www.teddy.it), and use the special form provided. Alternatively, you can contact the people in charge of the data subject's response:

Data Controller: Teddy S.p.A., via Coriano n. 58, Grosrimini, blocco 97, 47924 Rimini (RN), Tel. (+39) 0541 301411, Fax (+39) 0541 383430, E-mail [privacy@teddy.it](mailto:privacy@teddy.it)

Data Protection Officer (DPO): PRIVACY365 Italia S.r.l., viale Berna 9B, 47924 Rimini (RN), E-mail [dpo@teddy.it](mailto:dpo@teddy.it)

#### **11) CHANGES**

The Data Controller reserves the right to amend and/or supplement this Policy at any time and he undertakes to publish the changes on the website [www.teddy.it](http://www.teddy.it) into the Privacy Area and/or to inform Clients in the most appropriate manners assessed.