



INFORMATION CANDIDATES ISSUED PURSUANT TO EU REGULATION 2016/679

Industrial Wear S.r.l. (hereinafter, the “**Company**” or the “**Controller**”), acting as data controller, wishes to inform you, pursuant to Article 13 of EU Regulation 679/2016 concerning the protection of personal data (hereinafter, “**Regulation**” or “**GDPR**”) and national legislation, including individual provisions of the Supervisory Authority (**Data Protection Authority**), where applicable, and the provisions of Law No. 300 of 20 May 1970 (“**Workers’ Statute**”), that the personal data provided by you (“**Data Subject**”) shall be processed in compliance with current legislative and contractual provisions for the purposes and in the manner set out below. This information notice is also issued taking into account European provisions on equal pay and pay transparency between women and men.

1) **Types of personal data**

The Controller may primarily process the following types of common personal data:

- personal details and contact information (such as, by way of example, name, surname, date and place of birth, tax code, residence, domicile, telephone contacts, e-mail, gender);
- data relating to educational background (such as, by way of example, educational qualifications, attendance of specialist courses, master’s degrees, data relating to previous work experience);
- data relating to your work experience (such as, by way of example, date of employment, positions held, company role, any benefits, other data relating to work experience, professional qualifications and professional information published by the candidate) and related references;
- economic, financial and income data
- data provided by sending the curriculum vitae (such as, by way of example, images included in the CV) and other data collected in recruitment and personnel evaluation activities, including those provided when completing the information form;
- data obtainable through access to social media profiles;
- special categories of data acquired for the purposes of establishing, managing and terminating the employment relationship itself, as well as in application of legislation on labour law, health and safety and social protection.
- any other data voluntarily provided by the candidate.

Industrial Wear S.r.l., consistently with the principles of equality and non-discrimination as well as with current legislation on pay transparency, does not request or use information concerning remuneration received from previous employers for the determination of the economic offer, nor does it process such data for the purpose of individual pay comparison.

2) **Purpose of processing**

Personal data shall be processed by the Controller exclusively for purposes relating to recruitment procedures and to comply with legal, contractual or regulatory provisions, including provisions on equal treatment and pay transparency between women and men.

3) **Legal basis for processing**

The legal basis for processing is the possible establishment of an employment contract (Article 6(1)(b) of the Regulation), the legitimate interest of the Controller in verifying the candidate’s suitability to fill the specific open position (Article 6(1)(f) of the Regulation). The legal basis for processing data belonging to “special” categories is the Controller’s obligation to fulfil duties and exercise specific rights in the field of employment law, social security and social protection (see Article 9(2)(b) and General Authorization of the Data Protection Authority No. 1/2016, currently extended pursuant to Article 21 of Legislative Decree No. 101/2018), therefore pursuant to Article 9(2)(b) of the GDPR consent is not required. The legal basis for processing for purposes related to pay equality and transparency referred to in point 2 above is represented by compliance with obligations under European and national law on equal treatment and non-discrimination between women and men, as well as by the legitimate interest of the Controller in ensuring the correct application of objective, transparent and non-discriminatory pay criteria.

4) **Failure to provide data**

The provision of data is optional; however, it is necessary to carry out activities related to recruitment. Failure to provide data will result in the Company being unable to consider the application. With regard to information possibly processed for purposes of pay equality and transparency, Industrial Wear S.r.l. undertakes to limit the processing of data to that strictly necessary and not to request additional data not relevant for the purposes of recruitment and compliance with legal provisions.

5) **Method of processing and nature of provision**

Personal data shall be processed by the Controller and its authorised persons using IT systems (and manual systems) in accordance with legal principles and protecting the data subject’s confidentiality and rights through the adoption of appropriate technical and organisational measures to ensure a level of security appropriate to the risk pursuant to and in compliance with the provisions of Article 32 of the Regulation. As part of the selection process, and solely for this purpose, the Company may carry out verification activities of the information provided (e.g. academic qualifications and previous employers). For purposes relating to pay equality and transparency, data shall be processed, where possible, in aggregate or pseudonymised form, or communicated by means of averages, medians, percentages or pay bands, thus avoiding the disclosure of individual pay information directly attributable to individual data subjects/candidates, in compliance with the principle of minimisation and legal safeguards.

6) **Data retention**

Your personal data shall be processed and retained for the time necessary to pursue the purposes for which they were acquired. If, at the end of the selection procedures, a job offer does not materialise or is not accepted, your personal data shall be retained for a maximum period of 2 years from the date of closure of the aforementioned selection phase. Your data shall be retained for this period also to be able to demonstrate, in the event of a dispute, that the selection and recruitment processes were conducted without discrimination, in a correct and transparent manner, as well as to document the adoption of selection criteria and determination of conditions offered in accordance with the general principles of equality and pay transparency.



The data in question shall be stored in a password-protected IT database accessible only to the Human Resources Department and employees authorised to process it. Once these terms have expired, the data shall be deleted and/or destroyed.

7) **Disclosure, dissemination and transfer of data**

Your data may be shared with specific categories of recipients, such as parties who may access the data by virtue of legal, regulatory or European Community provisions, within the limits provided for by such provisions. Other parties may become aware of personal data in their capacity as External Data Processors or persons authorised to process data, as in the case of our employees. An updated list of External Data Processors is available upon request by the Data Subject. Under no circumstances shall the personal data processed be disseminated.

Your data may be disclosed to other companies belonging to the Group for the purpose of managing the recruitment process, as well as, in aggregate form not attributable to individual data subjects/candidates, for internal analysis purposes relating to pay equality and transparency. Any transfers of personal data to a third country outside the European Union or to an international organisation shall take place on the basis of an adequacy decision by the European Commission pursuant to Article 45(1) of the Regulation, or on the basis of the data subject's consent or performance of the contract pursuant to Article 49(1)(a) and (b) of the Regulation.

8) **Data Subject's rights**

Pursuant to Articles 15-22 of the Regulation, you have the right at any time to obtain confirmation as to whether or not processing of personal data concerning you is underway and, if so, to obtain access to it; to request information on the purposes of processing, the categories of data in question, the recipients to whom the data will be disclosed, the retention period; to request its rectification, erasure, restriction of processing and data portability, as well as to object to processing.

Specifically, you may exercise the following rights:

- **Right of access and rectification (Articles 15 and 16 of the Regulation):** the right to obtain confirmation as to whether or not processing of personal data is underway and, if so, to obtain access to it and the rectification of inaccurate data as well as the completion of incomplete data.
- **Right to erasure of data (Article 17 of the Regulation):** the right to erasure of personal data in the cases provided for by current legislation (e.g. personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, withdrawal of consent, unlawful processing, etc.).
- **Right to restriction of processing (Article 18 of the Regulation):** the right to obtain restriction of processing of personal data in the cases provided for by current legislation (inaccuracy of personal data, unlawful processing of data, etc.).
- **Right to data portability (Article 20 of the Regulation):** the right to receive one's own data in a structured, commonly used and machine-readable format, in order to transmit them to another controller, or, where requested, the right to direct transmission of data to another controller.
- **Right to object (Article 21 of the Regulation):** the right to object at any time to the processing of personal data pursuant to Article 6(1)(e) or (f), including profiling.

9) **Complaint to the Data Protection Authority**

In the event of a violation of the right to protection of personal data, you have the right to lodge a complaint with the Data Protection Authority in the manner and within the time limits set out on the website of the Data Protection Authority (https://www.garanteprivacy.it/web/garante-privacy-en/home_en).

10) **Exercise of rights**

Rights may be exercised by sending simple written communication addressed to Industrial Wear S.r.l. – Ufficio Privacy - con sede in Via Benito Partisani n.1- 47016 Fiumana di Predappio (FC), or by fax to +39 0543 1792144, or by e-mail to: privacy@payperwear.com, possibly using the forms made available on the website of the Data Protection Authority (https://www.garanteprivacy.it/web/garante-privacy-en/home_en).

11) **Identity and contact details of the Controller**

The Controller of personal data is Industrial Wear S.r.l. with registered office at Via Benito Partisani No. 1 - 47016 Fiumana di Predappio (FC), in the person of the Legal Representative pro tempore.

12) **Identity and contact details of the DPO**

The Data Protection Officer is Atty. Alessandra Biondi, who may be contacted at the following e-mail address: alessandra.biondi@ordineavvocatiforlicesena.eu