

PRIVACY POLICY – WEB GENERAL - Information notice pursuant to Art. 13 of the Regulation (EU) 2016/679 (“GDPR”)

According to **Regulation (EU) 2016/679** (General Data Protection Regulation) we provide you the due information concerning the processing of collected personal data. This notice is not to be considered valid for other websites attainable through links and data processor shall not be held responsible for third parties web pages.

This notice is provided pursuant to **art. 13** of the Regulation (EU) 2016/679 (General Data Protection Regulation) and according to the provisions of the **Directive 2002/58/CE**, as amended by **Directive 2009/136/CE** on Cookies, as well as according to the Provision of the Data Protection Authority dated 08.05.2014 on cookies.

Personal data: any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30).

DATA CONTROLLER

pursuant to art. 4 and 24 of the Reg. (EU) 2016/679, is **APEN GROUP SPA**– registered office in Via Isonzo 1, 20060 Pessano con Bornago (MI) Italy, represented by the legal representative pro tempore.

PURPOSES AND LAWFULNESS OF THE PROCESSING

	PURPOSE OF PROCESSING	LEGAL BASIS	DATA RETENTION	DATA CONFERRAL
A)	Website browsing Activities strictly related to site operations and to platform browsing service provision	Legitimate interest Data subject rights Art. 6 lett. f) and recital 47 GDPR: the processing is necessary for pursuing the legitimate interest of data controller or third parties’	Single browsing session	Necessary for the legitimate interest of data controller with due regard to user’s rights and fundamental freedoms
B)	Contact or information request	Legitimate interest Data subject rights Art. 6 lett.f) and recital 47 GDPR: the processing is necessary for pursuing the legitimate interest of data controller or third parties’	1 year	Necessary for the legitimate interest of data controller with due regard to user’s rights and fundamental freedoms
C)	Participation in personnel selection processes sending an application aiming at establishing an employment relationship - including any position other than those ones for which the data Subject spontaneously applied for; retention of personal data for future selections; management of applications; interviews and any video-interviews.	Contractual and pre-contractual measures upon data Subject’s request Art. 6 par. 1 lett. B) GDPR	2 years	Necessary to refine the application. It’s lack will entail the impossibility to apply.
D)	Signing up and login to the reserved area of the platform	Contract art. 6 lett. b) GDPR: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;	10 years starting from last login	Necessary to the execution of contractual obligations between parties.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

Personal data provided by you may be communicated to recipients who will act as Processors (art. 28 of the Reg. EU 2016/679) and/or persons acting under the authority of the Controller and the Processor (art.29 of the Reg. UE 2016/679) for the purposes pointed ahead. Precisely, your data may be communicated to recipients part of the following categories:

- subjects providing services for the management of the information system used by **APEN GROUP SPA** and telecommunications networks;
- Freelancers, studies or companies in the context of assistance and consultancy relationships;

- subjects providing services related to the management of the above mentioned purposes (communication, brochure printing, fliers, websites, videos);
- platform operators for the abovementioned services (websites hosting, etc);
- Competent authorities for compliance with legal obligations and / or provisions of public bodies, upon request;

DATA TRANSFER TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION

Personal data provided will not be transferred to a third Country outside the European Union.

DATA SUBJECT'S RIGHTS

You may freely exercise your rights at any time under the EU Reg. 2016/679 –GDPR, Sections 15, 16, 17, 18, 19, 20, 21 contacting the Data Controller - **APEN GROUP SPA** in person or its legal representative by means of E-Mail: **privacy@apengroup.it**.

You have the right, at any time, to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed, request their rectification or erasure.

Moreover You have the right, at any time, to oppose to personal data processing (also to profiling) without prejudice to lawfulness of processing.

Without prejudice to any other administrative or judicial remedy, in case you consider your data processing in contrast with Reg. UE 2016/679, pursuant to article 15 lett. f) of Reg. UE 2016/679, you have the right to lodge a complaint with a supervisory authority (www.garanteprivacy.it) and, pursuant to article 6 paragraph no. 1, lett. a) and article 9, paragraph no. 2, lett. a), you have the right to revoke your expressed consent at any time.

Exercising your right to data portability, the Data Controller may provide your personal data in a structured, commonly used and machine-readable format subject to the provisions set forth in paragraphs 3 and 4 of art. 20 of Regulation EU 2016/679.

Informative amendments: Data processor retains the right to modify, update, add or remove some parts of this informative at any time.

Date of review: 7/20/2020

DATA CONTROLLER

APEN GROUP SPA