# Information on data processing pursuant to art. 13 EU Regulation 2016/679 Candidates – "Lavora con VOI" portal

We inform you that this privacy statement is provided pursuant to art. 13 of EU Regulation 2016/679 (hereinafter "Regulation" or "GDPR") towards interested parties who apply for work collaboration. The Data Controller is VOIhotels S.p.A. with registered office in Via Lugaro, 15 10126 Turin (hereinafter "Owner"). The person responsible for the protection of personal data (hereinafter, "DPO") can be reached at the following address: DPO@voihotels.com

## Categories and types of data being processed

The personal data processed by the Data Controller may include:

- common data, such as personal information (for example name, surname, date of birth, address, image, gender, tax code, etc.), contact information (for example landline and/or mobile phone number, email address email, etc.), work and professional data;
- by filling in the form, uploading your curriculum vitae or subsequently, the Data Controller could
  collect "particular" data as defined in art. 9 of the GDPR, i.e. suitable for revealing racial and ethnic
  origin, religious beliefs, political opinions, membership of political parties, membership of trade
  unions, associations or organizations of a religious or philosophical nature, as well as the state of
  health (for example belonging to the so-called protected categories).

#### Purpose and legal basis of the processing of personal data

The data that you provide by filling in the form and uploading your curriculum will be processed for the following purposes:

- 1. creation of your account on the "Lavora con VOI" portal of VOIhotels SpA;
- 2. to evaluate the consistency of your profile with respect to the open job positions and in general for the management of the selection procedures for collaborators
- 3. to contact you in order to schedule interviews that may be necessary, using the contact details you provide.

The legal basis for the processing of your personal data for the purposes indicated above are the articles 6.1.b), i.e. the execution of a contract of which the interested party is a party or of pre-contractual measures adopted at the request of the same and 6.1.f) of the GDPR, i.e. the legitimate interest of the data controller to verify the suitability of the candidate to fill the specific open position.

The provision of your personal data for these purposes is optional but failure to provide it would make it impossible for the Data Controller to evaluate your profile or to be able to schedule interviews.

Any processing of particular data may take place pursuant to art. 9, par. 2, lit. b) and g), and 88 of the GDPR as well as art. 2-sexies, paragraph 2, lett. u) and uu) of the Privacy Code.

If your application for collaboration is accepted, your personal data will be processed by the Data Controller on the basis of the privacy policy prepared for employees and/or collaborators.

It is also possible that the personal data of third parties sent to the Data Controller will be processed. With respect to these hypotheses, you act as an independent Data Controller, assuming all the legal obligations and responsibilities. In this sense, you grant the widest indemnity on this point with respect to any objection, claim, request for compensation for damage from treatment, etc. that should reach the Data Controller from third parties whose personal data have been processed through its spontaneous submission in violation of the applicable personal data protection regulations. In any case, if you provide or otherwise process personal data of third parties, you guarantee from now on - assuming all connected responsibility - that this particular hypothesis of treatment is based on an appropriate legal basis which legitimizes the processing of the information in question.

### **Retention of personal data**

The data relating to your account and your curriculum will be kept for a period of 12 months from their provision or from the last update you made on the portal and can be used for contacts and any future interviews. At the end of this period, your data and the related account will be permanently deleted.

At any time, through the privacy settings of your account, you can request the deletion of your data and your account.

#### **Recipients**

Your data may be shared with:

- 1. subjects who typically act as data controllers pursuant to art. 28 of the GDPR;
- 2. persons authorized to process data pursuant to article 29 of the GDPR.
- 3. subjects, entities or authorities, independent data controllers, to whom it is mandatory to communicate your personal data by virtue of legal provisions or orders from the authorities;

The data may be accessible to the other companies of the Group for the same purposes mentioned above and/or for administrative-accounting purposes pursuant to art. 6 and in Recitals 47 and 48 of the Regulation. The updated and complete list of data processors is available on the Data Controller's website (privacy area) and in any case can be requested from the Data Controller at the addresses indicated above.

#### Data transfer outside the EU

As regards the possible transfer of data to third countries, the Data Controller ensures that the processing of your personal data by the recipients takes place in compliance with the GDPR. In particular, the transfers will be based on an adequacy decision of the European Commission or on the Standard Contractual Clauses approved by the European Commission or on another appropriate legal basis, in compliance with the recommendations 01/2020 adopted on 10 November 2020 by the European Data Protection Board .

#### **Your rights**

You have the right to access data concerning you at any time, pursuant to articles 15-22 GDPR. In particular, you may request the rectification, cancellation, limitation of the processing of the data in the cases provided for by art. 18 of the GDPR, to obtain the portability of data concerning you in the cases provided for by art. 20 of the GDPR, as well as proposing a complaint to the competent supervisory authority pursuant to article 77 of the GDPR (Guarantor for the Protection of Personal Data).

You can formulate a request for opposition to the processing of your data pursuant to article 21 of the GDPR in which to give evidence of the reasons justifying the opposition: the Data Controller reserves the right to evaluate your request, which would not be accepted in the event of the existence of legitimate reasons mandatory to proceed with the processing that prevail over your interests, rights and freedoms.

Requests must be addressed in writing to the Data Controller or to the DPO at the addresses indicated above.