

## **Information on the processing of personal data pursuant to Article 13 of Regulation (EU) 2016/679 For the management of applications and staff recruitment**

Stakeholders: candidates to be considered for the establishment of an employment relationship with Xenia Hotellerie Solution S.p.A. SB

Dear Stakeholder providing your data, we inform you that the protection of personal data is governed by Regulation (EU) 2016/679 "General Data Protection Regulation" (hereinafter "GDPR"). The processing of your personal data, in full compliance with the aforementioned legislation, will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and rights. In accordance with the legal provisions of the GDPR we provide you with the following information:

### **1. DATA CONTROLLER**

The data controller is Xenia Hotellerie Solution S.p.A. Società Benefit (hereinafter referred to as "Company"), in the person of its Legal Representative, with registered office in Via Antonio Gramsci, n. 79 - Guardiagrele (CH), with email address: [privacy@xeniahs.com](mailto:privacy@xeniahs.com) tel. 0289030.

### **2. CATEGORIES OF PERSONAL DATA, PURPOSES, LEGAL BASIS OF THE PROCESSING AND NATURE OF THE TRANSFER**

#### **➤ Categories of personal data**

The personal data that the Company processes are those that you provide directly for a possible application and for the correct management of the personnel selection process. More specifically, the personal data that the Data Controller processes include: Common Data (personal, identification and contact data, such as, by way of example but not limited to, name and surname, tax code, email address, telephone number, domiciliation data, data relating to studies and job position); as well as Special Data if the candidates belong to protected categories under Law 104/1992.

#### **➤ Purposes of processing**

Your data will be processed for the following purposes

- Evaluation and selection of candidates for possible establishment of an employment relationship.

#### **➤ Legal basis of the processing**

The legal basis for the processing of common data is that provided for in Article 6(1)(b) of the GDPR: performance of a contract to which the data subject is party or performance of pre-contractual measures taken at the data subject's request.

The legal basis for the processing of special data is that provided for in Article 9(2)(b) of the GDPR: the performance of obligations and the exercise of specific rights of the data controller or the data subject in the field of labour and social security law and social protection.

#### **➤ Nature of the provision of data**

The provision of data is optional and is left to the will of the person concerned (candidate) with the submission of his/her curriculum vitae. As regards the data subsequently requested by the



Data Controller, their provision is also optional in this case, but failure to provide such data will make it impossible to proceed with the verification of the prerequisites for recruitment and/or the start of the collaboration and, therefore, the possible establishment of the employment relationship with the Company.

### 3. METHODS OF DATA PROCESSING

The personal data provided by you will be processed in accordance with the aforementioned legislation and the obligations of confidentiality. This data will be processed by means of electronic calculators and computerised tools, as well as on paper.

All processing is carried out in compliance with the methods set out in Articles 6 and 32 of the GDPR, through the adoption of appropriate security measures. Processing operations are carried out in such a way as to guarantee the logical and physical security and confidentiality of your personal data.

### 4. CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE COMMUNICATED OR WHO MAY BECOME AWARE OF THE DATA IN THEIR CAPACITY AS DATA PROCESSORS OR PERSONS IN CHARGE OF THE PROCESSING - DATA RECIPIENTS

Your data will be processed only by personnel authorised by the Controller (such as employees and collaborators), pursuant to Art. 29 of the GDPR.

Your data may also be communicated to external subjects, such as consultants, professionals and suppliers, to whom certain activities are outsourced, for the proper management of the relationship. These subjects are expressly appointed as Data Processors, pursuant to Article 28 GDPR.

You can obtain a full list of the subjects appointed as Data Processors by sending an email to the Autonomous Data Controllers.

Your personal data will not be disseminated in any way and will not be transferred to countries outside the European Economic Area.

The data may be provided to the judicial authorities in the cases provided for by law.

### 5. RETENTION PERIOD

We would like to inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to Article 5 of the GDPR, the storage period of your personal data is that which is strictly necessary for the purposes for which the data is collected. Specifically, a period of time equal to the duration of the employment relationship is envisaged in the case of eventual employment; and a retention period equal to one year in the case of non-employment.

### 6. RIGHT OF THE DATA SUBJECT

You have the right to obtain from the data controller the erasure (right to be forgotten), limitation, updating, rectification, portability, objection to the processing of personal data concerning you, as well as in general you may exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

1. Right to access: you have the right to obtain from the data controller confirmation as to whether or not personal data concerning you are being processed and if so, even if not yet

registered, to obtain access to the personal data, their communication in intelligible form and all the information specified in Article 15 of the General Data Protection Regulation.

2. Right of rectification: the data subject shall have the right to obtain from the controller the updating, as well as the rectification of inaccurate personal data concerning him/her without undue delay and the integration of incomplete personal data, also by providing a supplementary declaration;
3. Right to erasure: the data subject has the right to obtain from the controller the erasure of personal data concerning him/her without undue delay, where the reasons specified in Article 17 of the General Data Protection Regulation exist;
4. Right to restriction of processing: the data subject has the right to obtain from the data controller the restriction of processing when one of the cases specified in Article 18 of the General Data Protection Regulation applies;
5. Right to data portability: the data subject has the right to receive in a structured, commonly used and machine-readable format the personal data concerning him/her that he/she has provided to a data controller and has the right to transmit such data to another data controller without hindrance from the data controller to whom he/she has provided the data if the conditions provided for in Article 20 of the General Data Protection Regulation apply;

The rights may be exercised by making a request to the data controller at the contacts indicated above.

## 7. COMPLAINTS

The interested party is hereby informed that if he/she considers that the activities carried out by the Data Controller in relation to the processing of his/her data violate the Regulation and/or compromise his/her rights, he/she may lodge a complaint with the Guarantor Authority by consulting the procedures on the institutional website <https://www.garanteprivacy.it/>.