

AXCENT S.R.L.	<p style="text-align: center;">PRIVACY MANAGEMENT SYSTEM REG. UE 679/2016</p> <p style="text-align: center;">RECRUITING DISCLOSURE</p>	<p style="text-align: center;">MOD. INF REV. 0 DEL 25.05.18 PAG 1 DI 4</p>
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1. Identity and contact details of the Holder and the Managers

The Data Controller is AXCENT S.R.L. with registered office in Via Pietro Mascagni 64 - 80128 Napoli (NA), P.Iva 05984521210.

The Data Protection Officer (DPO) is Mr. Antonio Rocco, designated by AXCENT Srl by letter of appointment dated 25/05/2018.

The updated list of data processors and persons in charge of data processing is kept at the registered office of the data controller.

AXCENT S.R.L., with registered office in Via Pietro Mascagni n. 64 - 80128 Napoli (NA), P.Iva 05984521210, as data controller, informs you in accordance with art. 13 of EU Regulation n. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the following purposes:

2. Object of the treatment

AXCENT S.R.L. processes personal data, identifiers (for example, name, surname, address, telephone, e-mail)- hereinafter, "personal data" or even "data" communicated by you through self-application for jobs by email, by registration on its website page "work for Axcent", sending or submitting paper curricula, acquisition of curricula from specific sites and application portals (i.e. LinkedIn) or selection and recruitment of employees.

3. Purpose of processing and legitimate interests

Your personal data will be processed without your express consent (art. 6 letter b), e) GDPR), for the following Service Purposes:

- the data are processed by AXCENT S.R.L. as data controller for the processing is necessary for the execution of a contract to which the data subject is a party or for the execution of pre-contractual measures dictated at the request of the data subject (personal data relating to pre-contractual activities of candidates in the selection and pre-employment phases);
- comply with obligations laid down by law, regulation, Community law or an order of the Authority (e.g. on anti-money laundering);
- exercise the rights of the holder, such as the right of defense in court;

4. Recipients of personal data and communication of data

Your data may be made accessible for the purposes referred to in art. 2 to employees and collaborators of the Data Controller, including external ones, as persons in charge and/or data processors and/or system administrators;

In the case of personal data of AXCENT S.R.L. employees, the data may be transmitted to the following recipients:

- Labor consultant for the fulfillment of obligations relating to the formulation of employment contracts;
- People in charge of human resources management for the storage of personal data and curricula;

Personal data are stored on servers located within the European Union. In any case, it is understood that the Owner, if necessary, will have the right to move the servers even outside the EU. In this case, the Owner hereby guarantees that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

Without the need for express consent (art. 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2 to supervisory bodies (such as IVASS), judicial authorities, insurance companies for the provision of insurance services, as well as to those persons to whom the communication is required by law for the performance of the aforementioned purposes. These subjects will process the data in their capacity as independent data controllers.

5. Processing methods and storage period

The processing of your personal data is carried out by means of the operations indicated in art. 4 no. 2) GDPR, namely: collection, recording, organization, storage, consultation, processing, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data is processed manually and automatically, both on paper and electronically.

The Data Controller shall process the personal data for the time necessary to fulfil the above purposes and in any case for **no longer than 5 years** from the termination of the relationship for the Service Purposes.

6. Rights of the data subject

As an interested party, you have the rights under Art. 15 GDPR and specifically the rights to:

1. obtain confirmation of the existence or not of personal data concerning you, even if not yet recorded, and their communication in intelligible form;
2. obtain information on: a) the source of the personal data; b) the purposes and methods of processing; c) the logic applied in the event of processing carried out with the help of electronic means; d) the identification data concerning the data controller, data processors and the representative designated pursuant to art. 3, paragraph 1, GDPR; e) the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing;

3. obtain: a) the updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
4. oppose, in whole or in part: a) on legitimate grounds, the processing of personal data concerning you, even if pertinent to the purpose of collection; b) the processing of personal data concerning you for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication, through the use of automated calling systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or mail. It should be noted that the right of opposition of the person concerned, as set out in point b) above, for direct marketing purposes by means of automated methods extends to the traditional ones and that, in any case, the possibility for the person concerned to exercise the right of opposition even in part remains unaffected. Therefore, the interested party may decide to receive only communications by traditional means or only automated communications or neither of the two types of communication.
5. Right to rectification of his personal data in the event that they are modified and do not respond to those previously acquired or communicated (art. 16)
6. Right to destruction of data ("right to be forgotten" Art. 17). AXCENT S.R.L., if one of the following cases exists, deletes the data from all the databases and archives where it is contained:
- a) personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
 - (b) the data subject withdraws his or her consent and if there is no other legal basis for the processing;
 - (c) the data subject opposes processing pursuant to Article 21(1) and there are no overriding legitimate grounds for processing, or opposes processing pursuant to Article 21(2);
 - (d) the personal data have been processed unlawfully;
 - (e) personal data must be erased in order to fulfil a legal obligation under Union or Member State law to which the controller is subject;
 - (f) personal data have been collected in relation to the provision of information society services as referred to in Article 8(1).
7. Right of restriction of processing (Article 18). The data subject has the right to obtain from the controller the restriction of the processing when one of the following situations occurs:
- (a) the data subject contests the accuracy of the personal data for as long as it is necessary for the controller to verify the accuracy of such personal data;
 - (b) the processing is unlawful and the data subject objects to the deletion of the personal data and requests instead that their use be limited;
 - (c) although the controller no longer needs it for the purposes of processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court;

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(d) the data subject has objected to the processing pursuant to Article 21(1) pending verification as to whether the legitimate reasons of the controller override those of the data subject.

8. Right of opposition (Art. 21-22): The data subject has the right to object at any time, on purposes relating to his/her particular situation, to the processing of personal data concerning him/her pursuant to Article 6(1)(e) or (f), including profiling on the basis of these provisions. AXCENT S.R.L. shall not subject the data to decisions based solely on automated processing.

AXCENT S.R.L. shall notify each data subject of any rectification, restriction or cancellation of the data.

AXCENT S.R.L. shall refrain from further processing personal data unless there are compelling legitimate grounds for processing which take precedence over the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of a right in court.

For the data that AXCENT S.R.L. processes for marketing purposes the rights of the interested party are expressed in the specific Information on the processing of data for marketing purposes

7. Procedures for the exercise of rights

You may at any time exercise your rights by sending an e-mail addressed to: **privacy@axcent.it**

7. Nature of data provision and consequences of refusal to reply

The provision of data for the purposes referred to in Article. 2. is mandatory. In their absence, we cannot guarantee the services of art. 3.