

**INTRODUCTION**

With the EU Regulation 679/2016, laying down provisions for the protection of natural persons, with respect to the processing of personal data, IGM Resins Italia Srl, based in Corso Magenta 82, Milan (hereinafter referred to as "organization"), as the Data Controller, represented by its pro tempore legal representative, is required to provide some information about the use of personal data.

**DATA SOURCE AND TYPES OF PROCESSED DATA**

Personal data acquired by the organization can be collected:

- directly from data subject (by delivering a hard copy of one's *curriculum vitae* and/or by applying through the company website). In the event of an application to a specific position or in the case of spontaneous application through the e-mail address available on the company website one's *curriculum vitae* and the personal data contained therein could potentially be viewed by the HR managers of the organization.

IGM Resins Italia S.r.l. will process the personal data of the data subject exclusively in compliance with the provisions of EU Regulation 679/2016 and the Italian privacy legislation in force or Legislative Decree 196/2003, as amended by Legislative Decree 101/2018, and in any case for the purposes and in the manner described in this disclaimer.

For the data not directly collected from the data subject, this disclosure is provided at the time of their registration and however, no later than the first possible communication.

The processed data is personal data (eg name and surname, address, telephone number, e-mail address, etc.) and possibly particular data (eg, membership of protected categories, registration with trade unions, etc.).

In particular, as part of the staff selection process, the organization may be in possession of data that the law defines as "sensitive", ie those from which it may possibly be deduced, among other things, the racial and ethnic origin, religious convictions, political opinions, membership of parties, trade unions, religious or philosophical, political or trade associations or organizations, as well as the state of health.

In any case, all this data is processed in compliance with the aforementioned law and with confidentiality obligations to which the organization's activity has always been based.



**DATA CONSERVATION PERIOD**

The data is kept only for the period necessary for the selection purposes for a specific position and, subject to optional consent, also for future positions of potential interest and in any case in accordance with national and EU laws, rules and regulations to which the organization must follow. It is expected that a periodic check will be carried out annually on the data processed and on the possibility of being able to cancel them if no longer necessary for the intended purposes. The specific *curricula vitae* will be safely destroyed if they are not considered more current or interesting, after a minimum period of 12 months after which, any return will not be possible.



**DATA PROVISION AND CONSEQUENCES IF NOT PROVIDED**

**MANDATORY/NOT MANDATORY**

The provision of data must be considered mandatory, with regard to the processing that the organization must carry out to meet the needs of knowledge and evaluation of candidates in the field of research and selection of staff, for the coverage of job positions, as well as legal obligations, rules, regulations. Failure to provide such data may make it impossible for the organization to initiate the process of research and selection of personnel.

The purposes for which the provision of data is mandatory are marked with the following symbol:



Consent is not mandatory for all other purposes and, even when provided, can be revoked at any time by the data subject.

The purposes for which the provision of data is NOT mandatory are marked with the following symbol:



**PURPOSES OF THE DATA PROCESSING**

The data is processed within the normal activity of the organization and for the following purposes. If the Data Controller intends to further process the personal data for a different purpose than that for which it was collected, he will beforehand provide to the data subject all necessary information and will proceed to request the consent where required.



Search and selection of personnel to be included within the organization for a specific position or after a spontaneous application, including the purposes of related legitimate interest or administrative obligations carried out for the purpose of public institutional character, the transposition and management of obligations provided for by laws, regulations and national and EU legislation, as well as by provisions issued by authorities legitimated by the law and by supervisory and inspection bodies.

Retention of data of the interested party for the purposes of research and selection of personnel also for future work positions to be included within the organization



**LEGAL BASIS OF DATA PROCESSING**

data is processed for the abovementioned purposes, as well as on the basis of consent (purpose n.2), also in order to comply with a contractual / pre-contractual, legal, regulatory obligation, as well as with instructions given by authorities legitimated to do so and by supervisory and inspection boards. The explicit regulatory references updated to their last revision status that foresee the obligations or fulfillment on the basis of which the data processing could be carried out (also particular data) are available and can be consulted at the Data Controller and in any case are part of the existing European Union law as well as of the Member State to which the controller is subjected.



**DATA PROCESSING METHODS**

Personal data processing is done by manual, IT and telematic tools with approaches strictly related to the purposes and in any case in order to guarantee the security and confidentiality of the data. The documentation is archived both electronically and on paper. Here is some essential information.



The collection of personal data is limited to the minimum necessary for each specific purpose of the processing



The personal data processing is limited to the purposes for which it was collected



The storage of personal data is limited to the minimum necessary for each specific purpose of the processing



Personal data is not sold or rented

**DISTRIBUTION AREA AND CATEGORIES OF PERSONS TO WHICH DATA CAN BE COMMUNICATED**



Personal data collected by the organization may be communicated, within the limits strictly relevant to the aforementioned purposes, also to the following persons or categories of persons. For all the aforementioned purposes, the communication of data also derives from a legal, contractual obligation or is a necessary requirement for the conclusion of a contract. In the absence of these communications, the relationship / contract may not be completely fulfilled. The data will not be transferred to Countries outside the EU.

- ✔ Persons to whom communication is required by law, by regulation or by national and EU legislation
- ✔ Labor consultants for the purpose of studying and resolving any legal problems related to the possible hiring.
- ✔ External offices specialized in consultancy aimed at recruiting and selecting personnel as well as managing related administrative obligations

**RIGHTS OF THE DATA SUBJECT**



At any time the data subject may exercise his / her rights towards the Data Controller, in accordance with EU Regulation 679/2016, by contacting IGM Resins Italia S.r.l. through the following addresses: [privacy@igmresins.com](mailto:privacy@igmresins.com) - Tel. + 39 0384 205230 - IGM Resins Italia srl, Via Grocco, 2979 - 27036 Mortara (PV) (for written communication). To guarantee the correct exercise of the rights, the data subject must be identifiable in an unequivocal manner. The organization agrees to provide feedback within 30 days and, if it is impossible to meet these deadlines, to justifying the possible extension of the deadlines. The response will be free of charge except in cases of groundlessness (eg there is no data concerning the applicant data subject) or excessive requests (eg repetitive over time) for which a fee may be charged no higher than the costs actually incurred for the research carried out in the specific case. The rights related to personal data concerning deceased persons may be exercised by those who have an interest of their own or act to protect the data subject or for family reasons deserving protection. The data subject can also submit a complaint to the supervisory authority.

In case of violation of personal data suffered by the organization, the Data Controller will proceed to notify the competent supervisory authority within 72 hours of the occurrence and will also communicate the event to the data subject, except in cases of exclusion provided for by law.

THE DATA SUBJECT HAS THE RIGHT TO REQUEST: access, rectification, deletion of personal data, limitation of processing, as well as data portability. THE DATA SUBJECT HAS THE RIGHT TO TAKE POSITION AGAINST: the data processing and to revoke the consent at any time without prejudice to the lawfulness of the processing based on the express consent before the revocation.

**RIGHT TO OBTAIN INFORMATION ABOUT**

**RIGHT TO OBTAIN**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• origin of personal data</li> <li>• categories of processed data</li> <li>• purposes and methods of data processing</li> <li>• conservation period</li> <li>• logic applied in case of data processing carried out with the aid of electronic instruments</li> <li>• identification details of the Data Controller and the Data Processor</li> <li>• Persons and sector of persons to whom personal data may be communicated or who can learn about them as managers or individuals in charge in Third Countries</li> <li>• existence of the profiling process</li> </ul> | <ul style="list-style-type: none"> <li>• confirmation of the existence or otherwise of their personal data and that such data are made available in an intelligible form</li> <li>• updating, rectification, data integration and limitation</li> <li>• cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed in violation of the law (including those for which storage is not necessary in relation to the purposes for which they were collected or subsequently processed)</li> <li>• certification that the operations referred to in the points above have been brought to the attention of those to whom the data have been communicated or spread, except in the case where this fulfillment reveals impossible or involves a use of means manifestly disproportionate to the right protected by the organization</li> <li>• data portability (direct transmission from one data controller to another)</li> <li>• copy of the data that is being processed</li> </ul> |
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**RIGHT TO TAKE POSITION AGAINST**

- the processing of personal data concerning the data subject including profiling for legitimate reasons, even if pertinent to the purpose of the collection
- the processing of personal data concerning the data subject for the purposes of: sending advertising material, direct sales, carrying out market research, commercial communications
- the processing of data processed for scientific or historical research purposes or for statistical purposes, except in the case of public interest in processing



**DISCLOSURE AND REQUEST FOR CONSENT TO PERSONAL DATA PROCESSING FOR CANDIDATES**


IGM Resins Italia Srl  
Corso Magenta 82, 20123 Milano

Rev. 2021

FIRST NAME AND LAST  
NAME .....

ADDRESS .....

Given that, as defined in the disclosure document that the undersigned expressly declares to have received and read, the execution of the process of research and selection of personnel by the organization may involve the need to process data (also particular data) of the data subject, the undersigned freely expresses consent in the manner indicated below.

PURPOSES FOR WHICH THE CONSENT IS REQUESTED	I CONSENT	I DENY CONSENT
 Retention of data of the data subject for the purposes of research and selection of personnel also for future work positions to be included within the organization	<input type="checkbox"/>	<input type="checkbox"/>

SIGNATURE .....

DATE .....