

## **Privacy Notice compliant with EU Regulation n. 2016/679 (GDPR)**

The company Wpro UK, with headquarters 2nd Floor Whitehall House, Company registered in England and Wales No. 04662076 as Data Controller of personal data (from now on "Owner"), pursuant to EU Regulation no. 2016/679 (hereinafter GDPR) informs you that your data will be processed in compliance with the principles of correctness, lawfulness, transparency and protection of your privacy and your rights with the following methods and purposes:

### 1. Subject of the processing:

1.1 The Data Controller will process your personal data relating to the following categories:

- \* Surname, Name, Date and Place of Birth, Tax ID
- \* E-mail and telephone contact
- \* Education and culture
- \* Work (current and previous occupation, declared profession, work experience and references)
- \* Country, province and address of residence
- \* Topics of interest

that you can communicate to us on the transmission of your Curriculum Vitae (hereafter CV), spontaneously entered by you on the company website <http://www.wpro-uk.com>, for the purposes of your possible candidacy to fill open job positions.

1.2 You will also be able to provide the following data relating to the particular categories defined in the art. 9 of the GDPR:

- \* racial and ethnic origin
- \* political opinions
- \* religious or philosophical beliefs
- \* membership of parties, trade unions, associations or organizations of a religious nature
- \* health state

Such data may be processed by the Owner only with your prior written consent to the processing of data, in accordance with the provisions of art. 6 of the GDPR. In this case we remind you that these Data will be processed exclusively for the purpose of inserting your name in the list of candidates, after having received your express written consent. If your consent is not received within twenty days of sending your data, one of our authorized parties will contact you to clarify the methods of issuing your written consent. Without your consent, the Owner will not be able to access the contents of your CV, with the consequence that you will not be able to take your candidacy into consideration and therefore fulfill the purposes referred to in point 2 below.

### 2. Purpose of the processing:

Your personal data is collected and processed for the purposes listed below along with the legal basis of reference:

\* fulfillment of a legal obligation;

\* conducting research and selecting possible candidates to be recruited from companies that use work services in execution of a fixed-term or permanent contract;

\* operational management of the navigation on the Portal at the address <http://www.wpro-uk.com> and of the relative access data, also for the purposes of data security and the portal.

Lawfulness of processing: processing is necessary for the execution of a contract of which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same

Legal basis: Union law

### 3. Processing methods:

The processing of your data includes the provisions of art. 4 of the GDPR: collection, registration, organization, structuring, conservation, extraction, consultation, use, communication by transmission or distribution or provision, cancellation and destruction.

Your personal data will be processed both on paper and by electronic and computerized means, with organization and processing logics strictly related to the purposes themselves and in compliance with the technical and organizational measures provided for by art. 32 of the GDPR, designed to guarantee the security, integrity and confidentiality of the data.

The Data Controller will process your data until 12/31/2050, unless you expressly request a processing or cancellation limitation.

If your data is provided by specifying the reference to a specific search announcement published in a newspaper or periodical, or by limiting your application to a particular region or location of interest, the processing of the same data in subsequent staff selections or in relation to areas other than the one indicated it will be implemented by the Data Controller only in the presence of your express consent, sent together with the curriculum or subsequently conferred. In the absence of your consent, the Data Controller will proceed, as soon as the activity related to the individual announcement or to the particular region or location of interest has ceased, to the cancellation of your data.

### 4. Security, integrity and data retention

The security, integrity and confidentiality of our users' data are extremely important to us. We have adopted technical, administrative and physical security measures aimed at protecting the user's personal data against unauthorized access, disclosure, use and modification. We regularly review our safety procedures to take into account new suitable technologies and methods. Note, however, that despite our greatest efforts, there are no perfect or impenetrable security measures. We will retain personal data for the time necessary for the purposes set forth in the Privacy Policy, unless a longer retention period is required or permitted by law.

### 5. Access to data:

Your data may be accessible, for the purposes referred to in point 2, to:

\* employees of the Data Controller, in their capacity as co-contractors, internal managers or authorized parties

\* collaborators of the Data Controller, in their capacity as Joint Data Controllers, external managers or authorized parties

## 6. Data communication:

Your data may be communicated, for the purposes referred to in point 2, to the following recipients:

\* Customers and Users of the owner's services in Italy or abroad, including countries outside the European Union

\* Companies controlling the Data Controller

\* Companies controlled by the Data Controller and connected to it

The communication and dissemination will not be made by the holder after the treatment period indicated in point 3, or in the case of your express request for cancellation; in this case, however, the owner cannot guarantee the fulfillment of the purposes for which his / her C.V. it will be send.

Communication and dissemination will not be made by the owner for purposes other than those indicated in point 2.

## 7. Data transfer internationally

Wherever your personal data is transferred, stored or processed by us, we will take appropriate measures to safeguard personal data. Furthermore, when we use or disclose personal data transferred from the European Union, we use standard contractual clauses approved by the European Commission, we adopt other measures under the laws of the European Union to ensure adequate protection, or we obtain the user's consent. When we use or disclose personal data transferred outside the European Union, we verify that the non-EU recipient guarantees adequate security standards for the protection of personal data, in compliance with the GDPR.

## 8. Nature of data provision and consequences of denial of consent

The provision of the Data Controller referred to in point 1.1 is mandatory for the purposes referred to in point 2.

The provision to the Data Controller referred to in point 1.2 is optional and, for the use by the Owner, his express consent is required.

## 9. Rights of the interested party:

As an interested party, you may exercise the following rights with respect to the Data Controller pursuant to art. 15 of the GDPR:

\* obtain access to your personal data and confirmation by the Data Controller that your data is processed safely and in compliance with the contents of the GDPR;

\* obtain information relating to: a) the purpose of the processing; b) data categories; c) recipients and categories of recipients to whom the data will be communicated, especially if they are recipients of third countries or international organizations; d) the data retention period; e) the existence of the right to obtain: - updating, rectification or, where interested therein, integration of your data in our possession, - cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those for which conservation is not necessary in relation to the purposes for which the data were collected or subsequently processed, - the attestation that the operations referred to in the previous points have been brought to the attention, even for what regards their content, those to whom the data have been communicated or disseminated, except in the case where such fulfillment proves impossible or involves the use of means manifestly disproportionate with respect to the protected right;

\* receive the identification details of the data controller, data processors and subjects in charge of processing;

\* object, in whole or in part, for legitimate reasons to the processing of your data.

As an interested party, you may also exercise the following rights with respect to the Data Controller pursuant to articles 16-21 of the GDPR:

\* correction of inaccurate data;

\* deletion of data ("right to oblivion");

\* limitation of data processing in the cases envisaged by art. 18 of the GDPR;

\* data portability, if the processing is based on consent or is carried out by automated means;

\* opposition, at any time, to data processing;

\* make a complaint to a supervisory authority.

You may exercise your rights at any time, pursuant to articles 15-21 of the GDPR, forwarding the request in one of the following ways:

\* by registered mail, to the following email address:

Wpro UK, 2nd 2nd Floor Whitehall House,

\* by sending an email directly to [international@wpro-uk.com](mailto:international@wpro-uk.com)

## 10. Data Controller, Data Processor and Authorized Processors:

The owner of the processing of your data is:

Wpro UK, based in 2nd 2nd Floor Whitehall House,.

The updated list of external managers and subjects authorized for processing is kept at the headquarters of the data controller.

## 11. Changes to this privacy statement

We may occasionally make changes to this Privacy Policy, for the purpose of incorporating new technologies, industry practices and regulatory requirements or for other purposes. We will inform the Data Subject if these changes are significant and we will obtain your consent, where required by applicable laws. We will inform the interested party by means of notification via e-mail to the last e-mail

address provided, or by publishing such changes on our sites and applications, or by other means, in compliance with the laws in force.