



## **Information on the Processing of Personal Data for Staff Recruitment Purposes**

The Euro-Mediterranean Center on Climate Change Foundation (hereinafter referred to as the "Foundation") would like to inform you, as the data subject, that, pursuant to the provisions of EU Regulation No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the "protection of individuals with regard to the processing of personal data and on the free movement of such data," as well as national legislation on the processing of personal data, the Data Controller is subject to a number of obligations. In this regard, the Foundation, as the Data Controller, is required to provide you with certain information regarding the methods and purposes of the processing of your personal data, which may come into its possession during the selection of candidates for possible collaboration.

### **1. Data Controller and Data Protection Officer**

The Data Controller of personal data is the Euro-Mediterranean Center on Climate Change Foundation, with registered office in Lecce (LE) - 73100, via Marco Biagi, 5, email: [privacy@cmcc.it](mailto:privacy@cmcc.it), certified email: [cmcc@pec.cmcc.it](mailto:cmcc@pec.cmcc.it), and telephone number: +39 0832 1902411. Any requests for clarification regarding the processing of data or to exercise the rights recognized by the Regulation or to obtain clarifications can be submitted through the aforementioned channels.

The Data Controller has appointed Avv. Andrea Lisi as Data Protection Officer, whose contact information are [dpo@cmcc.it](mailto:dpo@cmcc.it) and +39 0832256065.

### **2. Data subject to processing**

The Data Controller processes personal data provided by candidates through the completion of the application form available on the Foundation's recruiting portal (name and surname, email address, date of birth, phone number, residential address, citizenship, motivation letter, curriculum vitae, data related to the educational background, work experience, skills of the data subject, and any other personal data provided through the completion of the form) for purposes related to the evaluation of the application and the selection process. The information contained in the curriculum vitae and motivation letter may also include special categories of personal data, as defined in Article 9 of Regulation (EU) 679/2016 (GDPR), such as:

- data revealing racial or ethnic origin;
- data revealing trade union membership;
- data relating to the person's health or sexual orientation.

### **3. Nature of the provision and source of personal data**

The provision of data is optional and is at the discretion of the data subject to submit their application. However, failure to provide the requested data may result in the Data Controller's inability to evaluate the candidate's application. The provision of personal data may also be made, at the choice of the data subject, through integration procedures of the Foundation's recruiting portal with external sites (e.g., indeed.com). In this case, the identifying and contact data, as well as the personal data contained in the candidate's curriculum vitae present in the respective profile on the external site, will be acquired. This data will be used to pre-fill the application form.

### **4. Purposes and legal basis of the processing**

Personal data is collected and processed to follow up on the data subject's request, specifically to assess the prerequisites for hiring and/or initiating a collaboration. The legal basis for the processing is, therefore, the performance of pre-contractual measures taken at the request of the data subject, in accordance with Article 6(1)(b) of Regulation (EU) 679/2016 (GDPR). Regarding any special categories of data that may be provided, the legal basis for the processing is the data subject's consent, in accordance with Article 6(1)(a) of Regulation (EU) 679/2016 (GDPR).

### **5. Processing methods**



he processing will be carried out using computer or paper-based tools, including by authorized personnel who operate under the direct authority and according to the instructions given by the Data Controller, with logic strictly related to the aforementioned purposes and in a manner that ensures the security and confidentiality of the data. No automated decision-making processes will be used for data processing. Specific security measures are adopted to minimize the risks of destruction or accidental loss of the processed data, unauthorized access, or processing that is not permitted or compliant with the purposes indicated in this notice.

#### **6. Recipients of personal data**

Within the limits established by current legislation and the aforementioned purposes, your personal data may be communicated to all those subjects whose knowledge is essential for the performance of the services provided by the Data Controller, including:

- Collaborators and employees of the Data Controller specifically authorized within the scope of their duties;
- Personnel selection service providers, acting as Data Processors pursuant to Article 28 of the GDPR;
- Hireku, Inc., for the provision of the recruiting software called "Jazz HR," as well as its subcontractors listed on the webpage [www.JazzHR.com/subprocessors](http://www.JazzHR.com/subprocessors), who act, respectively, as Data Processor and other Data Processors;
- Indeed Ireland Operations Limited;
- Public authorities, supervisory and control bodies, and public security bodies in the manner and cases provided by law.

#### **7. Transfer of personal data to third countries**

The personal data provided by the data subjects will be transferred to third countries (in particular, to the United States of America) where the servers hosting the data collected through the recruiting portal are located. The transfer is subject to adequate safeguards, consisting of data protection standard contractual clauses pursuant to Article 46(2)(c) of the GDPR.

#### **8. Retention of personal data**

The personal data of candidates will be kept by the Data Controller for a period not exceeding 12 months from their collection unless the employment or collaboration relationship is established, or unless otherwise provided by law or required for judicial or administrative purposes.

In relation to job positions pertaining to projects under the National Recovery and Resilience Plan, the personal data of interviewed individuals will be retained for a period of 5 years from the project's closing date.

#### **9. Rights of the data subject**

In accordance with current legislation, each data subject has the right to access their personal data, request its rectification, updating, or erasure, or request the restriction of processing if the data is incomplete, inaccurate, unlawfully collected, or no longer necessary for the purposes. The data subject also has the right to object to the processing for legitimate reasons or to request data portability. In particular, the data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning them, even if not yet recorded, and their communication in an intelligible form. The data subject also has the right to obtain information regarding:

- The purposes and methods of the processing;
- The logic applied in case of processing carried out with the aid of electronic tools;
- The identification details of the Data Controller, Data Processors, and the individuals or categories of individuals to whom the personal data may be communicated or who may become aware of it as authorized processors. The data subject has the right to obtain:
- The updating, rectification, or integration of their data;



- The erasure, anonymization, or blocking of data processed unlawfully, including data that does not need to be stored in relation to the purposes of the processing;
- The restriction of processing in the cases provided for in Article 18 of the GDPR;
- The notification that the operations mentioned above have been brought to the attention of those to whom the data has been communicated or disclosed unless this proves impossible or involves a disproportionate effort compared to the protected right;
- The transmission of data concerning them, provided to the Data Controller and processed based on the data subject's consent, in a structured, commonly used, and machine-readable format. Pursuant to Article 20 of the GDPR, the data subject also has the right to transmit such data to another data controller without hindrance, where technically feasible, and to obtain direct transmission of personal data from one data controller to another. The data subject has the right to revoke their consent at any time if the processing is based on consent (pursuant to Article 7(3) of the GDPR). The data subject has the right to object, in whole or in part:
- For legitimate reasons, to the processing of personal data concerning them, even if relevant to the purpose of the collection;
- To the processing of personal data concerning them for the purpose of sending advertising materials or direct sales or for carrying out market research or commercial communication;
- To automated decision-making processes that significantly affect them. Without prejudice to any other administrative or judicial remedy, the data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State where they habitually reside, work, or where the alleged violation occurred.

#### **10. Exercise of rights**

To exercise these rights, data subjects can send an email to [privacy@cmcc.it](mailto:privacy@cmcc.it). The data subject may avail themselves of non-profit organizations, bodies, or associations with public interest objectives that are active in the field of protecting the rights and freedoms of data subjects concerning the protection of personal data, by giving an appropriate mandate for this purpose. The data subject may also be assisted by a trusted person. Further information on the purposes and methods of personal data processing can be obtained by writing to the address: [privacy@cmcc.it](mailto:privacy@cmcc.it). To learn about their rights and stay updated on the legislation regarding the protection of individuals with regard to the processing of personal data, the data subject can contact the Data Protection Authority and consult the website at [www.garanteprivacy.it](http://www.garanteprivacy.it).

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