



Privacy Notice pursuant to Articles 13 and 14 of EU Regulation 2016/679

Bitrock S.r.l. (hereinafter referred to as the "**Company**" or "**Controller**"), in the context of managing recruitment and selection procedures for the potential establishment of an employment relationship (regardless of the type of contractual or legal relationship), declares itself as an independent Data Controller pursuant to Articles 4(7) and 24 of EU Regulation 2016/679 of April 27, 2016 (hereinafter referred to as the "**Regulation**"). The Company provides this notice in accordance with Articles 13 and 14 of the Regulation, informing that the processing of personal data will be carried out for the purposes and in the manner described below.

This notice applies to the processing of data contained in curricula vitae (hereinafter, "CVs") submitted by data subjects for the purpose of establishing an employment relationship. It fulfills the information obligations set forth in Article 111-bis of Legislative Decree no. 196 of June 30, 2003 (hereinafter referred to as the "**Privacy Code**").

1. Identity and Contact Details of the Data Controller

The Data Controller is **Bitrock S.r.l.**, with its main office where the data processing activities are carried out located at Via Tortona 4, 20144 Milan (MI). The company can be contacted via email at: admin@bitrock.it.

2. Purposes and Legal Basis of Processing

| Recruitment and Selection | | |
|-------------------------------------|--|---------------------------------------|
| Name of Processing | Purposes | Legal Basis |
| Recruitment and Personnel Selection | Recruitment and personnel selection, evaluating professional profiles of interest emerging from spontaneously submitted CVs or managing all phases related to the submitted application. | Execution of pre-contractual measures |

3. Categories of Personal Data Subject to Processing

The Data Controller lists below the categories of personal data contained in CVs that will be processed:

Common Personal Data: Personal identification data of the data subject and, where applicable, of their family members or household members, including any changes to such data; contact details (e.g., email address and phone number); data regarding personal characteristics; information on educational, academic, and professional backgrounds of the data subject, including acquired skills, training activities, previous work experiences, past job roles, and any additional information contained in the candidate's CV.

BITROCK S.r.l.

Milano: Via Tortona, 4 - 20144 - Milano - Phone: +39 02 37920598

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info@bitrock.it - bitrock@pec.it - www.bitrock.it

Cap.Soc:400.000 € i.v.

C.F./P.I.: 10150530961



Sensitive Personal Data: "Sensitive personal data" refers to data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning health or sexual life, and, finally, data related to a person's sexual orientation.

4. Methods of Data Processing

The processing of Personal Data will be carried out using manual, IT, or telematic tools, designed to ensure its security and confidentiality, and performed by personnel duly trained to comply with Applicable Regulations.

We also inform you that your Personal Data will be processed in accordance with the methods outlined in the Regulation, which include, among other things, that the data must be:

- processed lawfully and fairly;
- collected and recorded for specific, explicit, and legitimate purposes;
- accurate and, where necessary, kept up to date;
- relevant, complete, and not excessive in relation to the purposes for which they are processed;
- stored in a manner that permits the identification of the data subject for no longer than necessary for the purposes for which they are collected or subsequently processed;
- processed according to uniform procedures established by a single supervisory authority ("Lead Authority"), identified with reference to the State where the Controller has its main establishment.

Furthermore, the Controller's corporate processes ensure the confidentiality and security of the information and its storage in compliance with legal requirements and the necessary security measures. Finally, data contained in the submitted CVs will be processed using paper, IT, or telematic tools.

5. Scope of Communication of Personal Data

The personal data collected may be processed not only directly by the Data Controller but also by authorized personnel.

Additionally, personal data may be communicated to entities external to the Data Controller who are either required or authorized to access the data by law, or who are linked to the Controller by specific relationships, including contractual ones, such as:

- External Data Processors formally appointed by the Controller for purposes related to the management of employment law obligations;
- Labor consultants or accountants for external consultancy activities;
- Insurance companies for the management of insurance policies;
- Professionals or external consultants for activities related to the management of work performance.

Personal data will not be disseminated unless with the prior explicit consent of the data subject.

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6. Retention Period and Deletion of Personal Data and CVs

The data will be retained for the time periods specified below, in accordance with Article 13, paragraph 2, letter a of the Regulation.

Candidates are informed that their personal data will be retained for a maximum of 24 months from the receipt of the CV, after which it will be deleted unless otherwise indicated or requested by the candidate.

In the event a contractual relationship is established with one of the independent Data Controllers, the CV will be retained along with all documentation related to the established contractual relationship, for the time period specified for the processing of contractual documentation, as outlined in the privacy notice provided at the time of hiring.

7. Rights of the Data Subjects

We inform you that, in accordance with current regulations, you are entitled to the following rights:

- To request access to your personal data from the Data Controller (Article 15 of the GDPR);
- To request the rectification of your data (Article 16 of the GDPR);
- To request the updating and deletion of your data if they are incomplete, incorrect, or collected unlawfully (Article 17 of the GDPR);
- To request the restriction of the processing of some of your personal information (Article 18 of the GDPR);
- To object, in whole or in part, to the processing of your data for legitimate reasons (Article 21 of the GDPR);
- To withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal, as provided by Article 7(3) of the GDPR.

To exercise your rights, you may contact the Data Controller using the contact details provided above.

Furthermore, if you are not satisfied with the response to your requests, you have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) in accordance with the procedures outlined in the Applicable Regulations.

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