

**PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF GDPR 2016/679  
(European Data Protection Regulation)**

This notice is provided to natural persons pursuant to Art. 13 of GDPR 679/2016 (European Data Protection Regulation).

**1) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER:** The Data Controller is Comer S.r.l. – Via Oroboni, 26/28 – 27029 Vigevano (PV) – VAT No. | Tax Code 00174100180 – [privacy@comergroup.it](mailto:privacy@comergroup.it).

**2) DATA PROCESSED:** The personal data processed includes identification, contact and CV-related data (i.e. relating to the candidate's education and professional experience). Should the candidate's CV/cover letter contain so-called special categories of data (capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information, sexual life or sexual orientation), pursuant to Art. 9(2)(a) of the GDPR, the candidate's consent shall be deemed a necessary condition for such processing. CVs submitted without the required expression of consent will not be considered.

**3) SOURCE, PURPOSES AND LEGAL BASIS OF PROCESSING:** The personal data processed is that voluntarily provided by the candidate when submitting their CV, and/or through direct contacts and/or as a result of a recruitment/selection process (including through Agencies), and is processed solely for purposes related to candidate evaluation and selection, or to propose other types of job opportunities consistent with the candidate's professional profile. In the event of a positive evaluation, the purpose will be to prepare the necessary documentation for the establishment of an employment or collaboration relationship. The legal basis is identified in Art. 6(1)(b) of the GDPR.

During the CV review or interview process, data belonging to special categories may also be disclosed and thus collected (such as data revealing racial or ethnic origin, religious, philosophical or other beliefs, trade union membership, health status, disability or membership of protected categories, or holding of political offices). The legal basis for such processing is consent, in accordance with Articles 7 and 9(1)(a) of the GDPR; failure to provide such consent may prevent a full assessment of the candidate's application.

**4) PROCESSING METHODS:** Data will be processed through paper-based and electronic means. We confirm that all organisational, physical and logical measures deemed necessary and/or appropriate to guarantee the integrity, confidentiality and availability of the data have been implemented.

**5) RECIPIENTS OF PERSONAL DATA:** Personal data contained in CVs will be disclosed to specifically identified parties. Internal staff are authorised to process data in relation to their respective roles and duties. Data collected may be shared with the Labour Consultant, companies operating in the ICT sector for maintenance purposes, consultants, and companies acting on behalf of the Data Controller.

**6) DATA TRANSFERS:** The Data Controller does not transfer personal data to third countries, and personal data will be managed and stored on servers located within the European Union. It is nonetheless understood that the Data Controller reserves the right, where necessary, to relocate servers or use Extra-EU cloud services. In such cases, the Data Controller hereby ensures that any transfer of data outside the EU will be carried out in compliance with applicable legal provisions, entering into agreements guaranteeing an adequate level of protection and/or adopting the Standard Contractual Clauses established by the European Commission, where required.

**7) DATA RETENTION:** The Data Controller retains and processes personal data relating to applications for a period not exceeding 12 months.

**8) DATA SUBJECT RIGHTS:** Pursuant to Arts. 15 (right of access), 16 (right to rectification), 17 (right to erasure), 18 (right to restriction of processing), 20 (right to data portability) and 21 of GDPR 679/16, the data subject may exercise their rights by writing to the Data Controller at the address above or by email at [privacy@comergroup.it](mailto:privacy@comergroup.it).

**9) WITHDRAWAL OF CONSENT:** With reference to Art. 7 of GDPR 679/16, the data subject may withdraw consent at any time.

#03 INFORMATIVA CANDIDATI CV



COMER s.r.l. ITALY - VIGEVANO (PV) 27029 Via Oroboni, 26/28 - Ph. (+39) 0381 42661 - PEC: [comersrlcert@pec.it](mailto:comersrlcert@pec.it)  
[www.comergroup.it](http://www.comergroup.it) - REA PV-118809 - R.I. C.F. P. IVA / VAT nr. IT 00174100180 - Capitale Sociale / Share Capital € 80.000





**10) RIGHT TO LODGE A COMPLAINT:** The data subject has the right to lodge a complaint with the supervisory authority of their country of residence.

**11) PROVISION OF DATA:** The provision of data is voluntary; however, failure to provide it may result in the inability to proceed with the evaluation/selection of the application.

**12) AUTOMATED DECISION-MAKING:** The Data Controller does not carry out any processing involving automated decision-making on the data processed.

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