

## Privacy Statement for applicants

Before providing any personal data and submitting your application, we invite you to carefully read this Privacy Statement, since it contains important information regarding the personal data protection and security measures adopted in order to ensure confidentiality and full respect for the applicable law. This Privacy Statement is intended for the collection of personal data when you apply for job positions either as a professional or as an employee, or at any interviews you may hold.

We recognise the importance of personal data protection and consider the preservation of confidentiality of your personal data as one of the main objectives of our activity. The processing of your data will be carried out in accordance with the principles of lawfulness, fairness, transparency, accuracy, purpose and storage limitations, data minimisation, integrity and confidentiality.



### DATA CONTROLLER

The data controller of the processing activities carried out through the website ICT Legal Consulting Studio Legale Associato Balboni Bolognini & Partners with registered offices in Via Borgonuovo, 12 - 20121 Milan - Italy (“ICTLC”, “We”, etc.).



### DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) who is freely contactable for any information relating to the processing of your personal data at the following address: [dpo@ictlc.com](mailto:dpo@ictlc.com).



### PERSONAL DATA SUBJECT TO PROCESSING

“Personal Data” means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of that natural person. We collect the following personal data:

#### **a. Personal, contact and academic/professional Data**

When sending your application and Curriculum Vitae, or during interviews, you share information about your identity and your academic and professional background, suitable for the evaluation of your application.

#### **b. Particular categories of Data (e.g., health status)**

Through your Curriculum Vitae we may obtain information that are special categories of personal data (e.g. information on your health status, trade union membership, religious beliefs, political orientation, etc.). This information, which you also may have freely provided during the interview phase, will only be taken into consideration in the cases strictly provided for by law (e.g., applications for positions reserved for protected categories).



#### **FONTES SOURCE OF THE DATA**

The personal data to be processed will either be provided directly by you on the occasion of your application or subsequent interviews, or collected by third parties, e.g. Head-hunters, in charge of the selection process.



#### **PURPOSES AND LEGAL BASIS OF THE PROCESSING**

The personal data that you provide by applying or during any interview will be processed for the purposes indicated below.



a. Purposes related to the assessment of your profile and your application, even if spontaneous, for a job position. The legal basis for this processing of personal data is the performance of precontractual measures adopted on your request that does not require your prior consent under the applicable law.



b. Purposes related to the compliance with a legal obligation to which we may be subjected (e.g., about obligations to guarantee employment positions for protected categories).

The processing of the data you provide may be necessary to comply with a legal obligation, a regulatory provision or an order of the competent authorities.



- c. Purposes related to the possibility of retaining your Curriculum Vitae and the information collected during any interviews that may have taken place in order to re-contact you for any future job positions in line with your profile.

The processing of this data is based on ICTLC's legitimate interest in re-contacting candidates deemed suitable for subsequent searches.



- d. Purposes necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

The processing of this data is based on ICTLC's legitimate interest in ensuring judicial or extrajudicial protection whenever necessary.

#### **VOLUNTARY OR OBLIGATORY NATURE OF PROVIDING THE DATA**

Providing your Personal Data for the above-mentioned purposes is voluntary, however, any refusal to provide such data may not allow ICTLC to evaluate your application.



#### **RECIPIENTS**

Your personal data may be disclosed, in close relation to the purposes specified above, only to:

- a. third parties offering us services (e.g., hosting or cloud computing services) which typically process Personal Data on behalf of ICTLC as data processors, or ICTLC group companies that may be involved in the evaluation of CVs received and candidates;
- b. persons authorized to process personal data, that are committed to/ or under an appropriate statutory obligation of confidentiality (e.g., employees and lawyers).



## TRANSFERS

Some of your Personal Data are transferred to Recipients who may be established outside the European Economic Area. ICTLC ensure that the processing of Personal Data by these Recipients is carried out pursuant to the Applicable Law. In fact, the transfer of Personal Data is based alternatively on an adequacy decision or the Standard Contractual Clauses issued by the European Commission. Further details and the signed agreements may be requested to the DPO.



## DATA RETENTION

We will process your personal data only for the duration strictly necessary to achieve the purposes listed in the "Purposes and legal basis of the processing" section. In particular, we will process your personal data ICTLC will process your Personal Data for 24 months after receiving your application and CV in order to contact you again for possible future job positions in line with your profile.



## YOUR RIGHTS

Pursuant to and to the extent allowed by the applicable law, you have the right, at any time, to request to us access to, rectification, erasure, restriction of the processing concerning your personal data or to object to a relevant processing activity and to receive in a structured, commonly used and machine-readable format the personal data concerning you.

Requests to exercise your rights shall be submitted to the following address: **dpo@ictlc.com**.



Pursuant to the Applicable Law, you have the right to lodge a complaint with the relevant supervisory authority (Garante per la Protezione dei Dati Personali) if you believe that the processing of your personal data is against the applicable law.

## AMENDEMENTS

This Privacy Statement came into force on 12/06/2025.