

CONFIDENTIALITY INTEGRITY		AVAILABILITY	TRACEABILITY	
INTERNAL	MEDIUM	MEDIUM	LOW	



# Information required by Regulation (EU) 2016/679

#### **PREMISE**

**Friulpress-Samp spa** considers the protection of personal data of fundamental importance, ensuring that processing takes place in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 (hereinafter the "*Regulation*" or "*GDPR*"), by other national and EU rules as well as the provisions of the data Protection Authorities. The processing of personal data operated by **Friulpress-Samp spa** is inspired by the principles of lawfulness, correctness and transparency and Data Controller uses the minimum set of data for the strictly necessary period of time. **Friulpress-Samp spa** processes data as accurate and up to date as possible, preserving security and as established in GDPR, following principle of transparency, and provides the following information.

	Data Controller	Friulpress-Samp SpA
		Zona industriale 5
		33079 Sesto al Reghena (PN)
	AUTOMOTIVE	Tel: +39 0434-693211
111111113		
	Data Protection Officer (DPO)	Data Protection Officer
( )		c/o Friulpress-Samp SpA
		DPO@HDT-IT2.com
w w		



#### ORIGIN AND TYPE OF PERSONAL DATA PROCESSED

The data is collected directly from the Data Subject or by the company/entity to which a service contract is in place. Where required by law, with protection of professional secrecy, it is possible that data relating to the possession of particular qualifications or the absence of criminal proceedings and convictions (art. 10 of the GDPR) as well as personal data governed by art. 9 of the GDPR (so called "special categories of personal data") as in the case where biometric data are required for access to protected areas and systems. The processing, however, complies with the principle of data minimization and storage limitation.

The personal data processed include the following:

- personal and tax details;
- contact details (mobile, landline, email);
- data relating to the study curriculum and professional path.

PURPOSE	LEGAL BASIS	NOTES & RETENTION TIMES
Selection of candidates aimed at establishing a working relationship or collaboration.	Consent (6.1.a or 9.2.a)	During the selection process, the profile is examined but data coming from social media is not processed and data that may entail risks of discrimination are not processed. The data processed is relevant to recruiting (personal and contact details, skills, competences and professional path, possession of the requirements required for the job,). You may proceed with the processing of particular data referred to in the art. 9 of the GDPR in the case, for example, of belonging to protected categories.  The data is kept until the end of the selection process and, subsequently, may be kept for 10 years, in view of further possible proposals.
Exercise of a right in court for the defense of the interests of	to ascertain, exercise or defend a right in court	This practice may also involve analysis of backup copies of the data.
the Data Controller and its	(art. 9.2.f).	copies of the data.

<sup>1</sup>Article 9 of the GDPR considers data "revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation".

Sess-Samp S.p.A. Via Zona Industriale, 5 Partita IVA / C.F. IT 00121890933 HDT-AUTO.COM

Friulpress-Samp S.p.A. a socio unico

Società sottoposta a direzione e coordinamento di HDT Automotive Solutions LLC Via Zona Industriale, 5 33079 Sesto al Reghena PN ITALY Tel. (+39) 0434-693211 Fax (+39) 0434-699381 e-mail info@hdt-it2.com Partita IVA / C.F. IT 00121890933 Registro Imprese PN - UD nr.00121890933 REA n. PN - 19508 DUNS: 43-165-7139 Capitale Sociale € 2.525.200 i.v. PEC friulpress-samp-spa@legalmail.it







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Customers and/or the analysis of legally significant events	The data is kept for the maximum time established by the applicable legal provisions regarding the
	limitation of rights and/or expiration of the action
	and, in any case, for the entire duration of the
	judgment in all its phases and degrees.



# MANDATORY PROVISION OF DATA

Most of the data is collected using explicit consent given by Data Subject as legal basis.

The absence of consent, depending on the case, will result in the impossibility of taking part in the selection process or the impossibility for the company to retain your data for future selections or research.



#### RECIPIENTS AND SUBJECTS AUTHORIZED TO PROCESS

Without prejudice to the communications and disseminations carried out in execution of contractual obligations, those ordered by orders of the Authorities or required by law, assuming that communication to third parties does not exempt the latter from providing the information and from asking for consent to the processing, it is specified that the data may be communicated to the Headunting company which provided its name solely to communicate the outcome of the selection.

The data may be processed by subjects qualified as **Data Processors** pursuant to art. 4.8 and art. 28 of the GDPR (professionals, lawyers, consultancy and service companies, hardware and software assistance companies, Parent Company or controlled and associated companies, ...) and by **subjects authorized** to process pursuant to art. 29, who operate under the direct authority of the Data Controller who has instructed them in this regard (employees and collaborators).





For Institutional Pages, Facebook and Instagram offer a set of analytical tools from which to desume aggregate data that help understand how people interact with these two Platforms. Meta Platforms Ireland Limited, the company that offers Facebook and Instagram services, therefore receives the data of subjects who visit the social pages managed by **Friulpress-Samp spa** who, otherwise, would not interact with the social networks.

As regards the processing of statistical data on Facebook and Instagram pages, **Friulpress-Samp spa** is Joint Controller with Meta Platforms Ireland Limited ("Meta").

Similarly, also with regard to the possible inclusion of the Facebook "*Like*" button on the website pages which allows users to share preferences on the social network, **Friulpress-Samp spa** and Meta Platforms Ireland Limited must be considered "Joint Controllers" for data collection operations, not for post-collection processing carried out by Meta.

At the link https://www.facebook.com/legal/terms/page\_controller\_addendum it is possible to consult the appendix on the data controller which indicates the division of responsibilities between Meta and **Friulpress-Samp spa.** At the link https://www.facebook.com/about/privacy/update you can consult the Meta information and find, among others, the following information:

- What types of information Meta collects;
- How you use that information;
- How this information is shared;
- The legal bases for data processing;
- How to exercise the rights provided by the GDPR;
- Meta Platforms Ireland Limited contact details for data protection matters;
- The contact details of the Data Protection Officer for Meta Platforms Ireland Limited:
- Facebook and Instagram visitor rights provided by the GDPR;
- The data retention period;

On this page (https://www.facebook.com/policies/cookies/) you can consult Meta's cookie policy.

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#### TRANSFER OF PERSONAL DATA TO COUNTRIES NOT BELONGING TO THE **EUROPEAN UNION**

The Data Controller makes use of professional services offered by some suppliers, adequately qualified as Data Processors. This may result in the data being transferred outside the EU territory but only:

- towards countries subject to an adequacy decision by the European Commission or the Guarantor (art. 45 of the GDPR);
- in countries located outside the EEA, subject to signing the Standard Contractual Clauses adopted/approved by the European Commission pursuant to art. 46, 2, letter. c) and d). In the event that this occurs, a copy of the guarantees referred to in art. 46, par. 2, letter. c) and d), used by the Data Controller can be obtained by writing an e-mail to the DPO;
- towards entities that have an international structure and which have provided for the signing, at group level, of specific Binding Corporate Rules, pursuant to art. 47 of the GDPR;

Furthermore, the company makes use of the services of the parent company's HR office which provides consultancy and support services in the selection process. Solely for these reasons, it is possible that your CV and data are managed with your consent (art. 49 of the GDPR) by Group collaborators located in the United States.



### RIGHTS OF DATA SUBJECTS (ARTICLES 15-22 OF THE GDPR)

Data Subject has the right to obtain, from the Data Controller, confirmation as to whether or not personal data concerning him or her are being processed and, consequently, to request access to personal data (art. 15 of the GDPR), rectification (art. 16 of the GDPR), cancellation (art. 17 of the GDPR) or limitation of processing (art. 18 of the GDPR), as well as to data portability (art. 20 of the GDPR).

The Data Subject has the right to object to the processing carried out on the basis of the art. 6, paragraph 1 letters e (execution of a task of public interest or connected to the exercise of public powers) and f (legitimate interest), for reasons connected to his/her particular situation (art. 21 of the GDPR).

The Data Subject also has the right not to be subjected to a decision based solely on automated processing, if it produces legal effects or if it significantly affects him/her (art. 22 of the GDPR). At any time, the Data Subject has the right to withdraw consent, without prejudice, however, to the lawfulness of the processing based on the consent given before the revocation. Data Subject has also the right to lodge a complaint with a Supervisory Authority.



#### **PROFILING**

No profiling processes are implemented at the Data Controller's premises for employees, relatives and family members.



# **FURTHER PURPOSES**

If the data controller intends to further process the personal data for a purpose other than that for which they were collected, before such further processing it undertakes to provide the interested party with information regarding this different purpose and any further relevant information.

## **Consent formula**

The undersigned, having acquired the information referred to in articles 13 and 14 of Regulation (U)E 2016/679, by placing his signature at the bottom of this form, declares to consent or not to consent to the processing of his personal data for the purposes indicated below:

Purpose	Consent to Processing	
Participation in the selection process	Yes □	No □
Data retention for future selections	Yes □	No □
Transmission of data (art. 49 of the GDPR) to the group HR office, for the purposes of support in the selection of figures to be included in the workforce	Yes 🗆	No 🗆

Signature

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