

CURRICULUM VITAE PRIVACY POLICY ex Articles 13 and 14 EU Regulation No. 2016/679

The following privacy policy is provided pursuant to Articles 13 and 14 of the European Regulation No. 2016/679 and is intended to provide the following information necessary to ensure a correct and transparent processing of your personal data.

The Controller

The Controller is Sterling S.p.A., C.F. and VAT number 03049420544, with its registered office at Via della Carboneria, n. 30 – 06073, Corciano (PG) – Italy (hereinafter, the "Company") – e-mail: privacy@sterling.it.

Categories of personal data received

The personal data that will be processed belong to the following categories:

- Identification data
- Curricular data

Source of personal data collection

The personal data that are processed could have been collected directly from you or could have been transmitted to our Company by a recruitment or headhunting agency to whom you have submitted your CV.

Processing purpose and legal basis

The processing of personal data provided in your CV is aimed solely at:

Processing purpose	Legal Basis
Management of personnel selection procedures	Performance of the contract or of pre-contractual measures.
Retention of contact details only for subsequent personnel selection procedures	Legitimate interest of the Controller

Recipients or other possible categories of recipients of personal data

Your personal data may be communicated, only for above-mentioned purposes, to the following categories of recipients:

- Information Technology companies.
- Employment administration companies, recruitment companies.
- Appointed subjects.
- Group companies (only for administrative and accounting purposes).

Data retention period

The data provided for the above-mentioned purposes will be kept for:

Processing purpose	Retention Criteria	
Management of personnel selection procedures	Curricular data: 1 year from receipt and not later	
	than 6 months after the closure of the process	
	selection	
Retention of contact details only for subsequent personnel	Contact data: 6 months after the closure of the	
selection procedures	process selection	

How and where we process your personal data

Your personal data will be processed within the European Union through IT/manuals tools for which we have applied appropriate security measures and with the support of our staff who has been duly authorized and trained for this specific purpose. However, it is understood that the Controller, if necessary, shall have the right to move servers even outside the European Union. In such a case, the Controller hereby ensures that the transfer of personal data outside the European Union shall take place in compliance with the applicable legal provisions, for example through the adoption of standard contractual clauses provided by the European Commission that ensure an adequate level of protection of personal data even outside the European Union.

Rights of the data subject

As a data subject, you have the right to: (i) request access to your personal data; (ii) ask for the rectification, limitation of deletion of your personal data; (iii) oppose to the processing of your personal data and (iv) request the portability of your personal data, if necessary. To facilitate the exercise of your rights, the Company has created a special e-mail

Via della Carboneria, 30 T +39 075 5294001 Solomeo, 06073 F +39 075 5294001 Corciano (PG) info@sterling.it Www.sterling.it	
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address privacy@sterling.it or, alternatively, you can use any other mean of contact of our Company (telephone, fax, etc.) Before we can provide or modify any information, you might be asked to verify your identity and answer some questions. An answer will be provided as soon as possible.

Right to complain

If you still consider that your rights have been violated, you can lodge a complaint before the Privacy Authority through the appropriate form published on the website www.garanteprivacy.it

Mandatory disclosure of personal data and consequences of refusal

Processing personal data purpose	Mandatory	Consequences of the refusal
Management of personnel selection procedures	YES	Impossibility to establish a contractual relationship
Retention of contact details only for subsequent personnel selection procedures	NO	Impossibility to be contacted for further selections

Date,		
	Signa	ature for acknowledgement