



**Tethis S.p.A.**

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## INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CANDIDATES

The company **Tethis S.p.A.**, in its capacity as Data Controller (the "**Company**" or the "**Data Controller**"), informs candidates (the "**Candidates**" or, in the singular, the "**Candidate**"), pursuant to the current legislation on the protection of personal data (the "**Privacy Legislation**") including the EU Regulation 2016/679 (the "**GDPR**"), who intend to send their curriculum vitae (the "**CV**") through correspondence or through the website *www.tethis-lab.com* (the "**Site**"), that it will process the personal data included in the CVs or otherwise provided for the following purposes and in the following manner.

### **Data Controller and Data Protection Officer**

The Data Controller for the processing of personal data is Tethis S.p.A with operational headquarters in Milan, via Olgiati, 5 - 20143.

The Company has designated a Data Protection Officer, who can be contacted at e-mail: [dpo@tethis-lab.com](mailto:dpo@tethis-lab.com).

### **Data processed**

The Data Controller processes the following personal data you provide through your CV during the selection phase and at the job interview: common data such as, but not limited to name, address or other personal identification, telephone and e-mail contact details, education level, professional title, e-mail address and telephone number.

The Company generally does not process data belonging to the special categories under Article 9 GDPR ("**Special Categories of Data**") (such as, for example, data disclosing health status or membership in a trade union association). However, as part of the selection phase, it may be necessary to acquire Special Categories of Data transmitted by the Candidate within the CV (e.g. legally protected status).

### **Source of personal data**

The personal data subject to processing may be conferred directly by the Candidates or collected from other sources, in cases where the collaboration relationship has been established through third parties relied upon by the Data Controller (specialized personnel selection companies, employment agencies, universities, etc.). In such cases, the Data Controller may request specific documentation from Candidates (identity card, residence permit, employment notice, training certificates, etc.).

Personal data from public records acquired by the Company for purposes related to the proper establishment of the employment relationship may also constitute processing.

Personal data received from third-party sources will be processed for the same purposes as set forth in this policy.

### **Purpose and legal basis for processing**

The personal data provided through the CV and collected from correspondence with Candidates and/or through interviews, or through contact forms on the Company's website will be processed, electronically and physically, for activities related exclusively to the selection of the Company's employees and/or collaborators (the "**Purpose**") and will be used for the sole purpose of evaluating the applications transmitted and to satisfy or give feedback to them. The legal basis applicable to the processing of the above-mentioned common data consists of the execution of pre-contractual measures aimed at finalizing the recruitment of personnel and the related signing of the employment contract. The lawfulness of the processing of special data is based on Article 9(2)(b) of the GDPR, as it is necessary to fulfil the obligations and exercise the specific rights of the Company or the Candidate in the field of labour law and social security and social protection.

### **Nature of provision of Data**

The provision of personal data is not mandatory but is necessary to carry out the selection process.

Failure to provide the above personal data, therefore, may result in the Company's inability to follow up on the selection process and the eventual establishment of the employment relationship.

### **Method of treatment**

Processing may consist of the operations or set of operations specified in Article 4.1 (2) of the GDPR, such as in particular: collection, recording, storage, consultation, use, restriction, erasure or destruction of personal data (the "**Processing**").

Candidates' personal data will be processed by non-automated and automated means for the time strictly necessary to achieve the Purpose for which it was collected. Specific security measures will be observed to prevent data loss, illicit or incorrect use and unauthorized access.

Candidates' personal data will not be disclosed to third parties and will not be disseminated.

### **Transfer of data outside the EU**

Candidates' personal data will not be disclosed to recipients other than those indicated above in this notice.

Any transfer of personal data to non-EU countries may only take place under the terms and with the guarantees provided by the Privacy Regulations and, in particular, in accordance with Articles 44 - 49 of the GDPR.

### **Data Retention Period**

Personal data of Applicants will be stored and processed for a period not exceeding 12 months (the "**Retention Period**").

At the end of the Retention Period, Candidates' personal data will be deleted, unless there are additional legitimate interests of the Data Controller and/or legal obligations that make it necessary, after minimization, to retain them.

### **The Rights of Candidates**

The Data Controller informs Candidates that, in their capacity as data subjects, in accordance with the law, they will have the right to withdraw their consent at any time, where given for any further purposes other than those described above.

In addition, they may at any time exercise the following rights (collectively, the "**Rights**"):

- a) the so-called "right of access" to personal data under Article 15 GDPR, and specifically: to obtain confirmation of the existence or otherwise of personal data concerning the Candidate, even if not yet registered, and their communication in intelligible form, as well as to obtain the following information:
  - 1. the purposes and methods of the Processing of personal data (including the existence of automated decision-making, including profiling as referred to in Art. 22(1) and (4) GDPR and, at least in such cases, meaningful information on the logic used, as well as the importance and expected consequences of such processing for the data subject), the categories of personal data processed, the origin of the personal data, the period of retention of personal data (where possible), or the criteria used to determine this period;
  - 2. the identification details of the Data Controller, the Data Processors and the Designated Representative in accordance with Article 5, paragraph 2; e) GDPR and in general of all the subjects or categories of subjects to whom the personal data have been or will be communicated on the Italian territory, in particular if there are recipients from third countries or international organizations (and in this case, the Candidate also has the right to be informed of the existence of adequate guarantees under Article 46 GDPR relating to the transfer);
  - 3. the existence of the right, as a data subject, to request from the Data controller the rectification, erasure or restriction of the processing of their personal data or to object to their processing;
- b) The right to file a complaint with the Italian Data Protection Authority for the protection of one's personal data (the "**Garante**");
- c) the so-called "right to rectification" under Article 16 GDPR: the right to request the rectification or, should they have an interest, the integration of their personal data;
- d) the so-called "right to erasure" (or "right to be forgotten") under Art. 17 GDPR: the right to request the deletion, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the Candidates' data were collected or subsequently processed;
- e) the so-called "right to restriction of processing" under Article 18 GDPR: the right to obtain from the Data Controller the restriction of processing in certain cases provided for under the Privacy Regulations;
- f) the right to request from the Data Controller, pursuant to Article 19 GDPR, indication of the recipients to whom he has notified any rectification or erasure or restriction of processing (made pursuant to Articles 16, 17 and 18 GDPR, in fulfilment of the notification obligation except where this proves impossible or involves a disproportionate effort);
- g) the so-called "right to data portability" under Article 20 GDPR: the right to receive (or to transmit directly to another Data Controller) personal data in a structured, commonly used, machine-readable format;
- h) the so-called "right to object" under Article 20 GDPR: the right to object, in whole or in part:

1. for legitimate reasons to the processing of personal data, even if relevant to the purpose of collection;
2. to the processing of personal data, for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

In the above cases, where necessary, the Data Controller will bring to the attention of third parties to whom the personal data of Candidates are communicated the possible exercise of Rights, except in specific cases (e.g. when such fulfilment proves impossible or involves the use of means manifestly disproportionate to the protected right).

### **Exercise of Rights and Complaint to the Guarantor**

The Candidate may at any time exercise his/her Rights in the following ways:

- a) By sending an e-mail to the Data Controller's e-mail address: [privacy@tethis-lab.com](mailto:privacy@tethis-lab.com);
- b) By sending an e-mail to DPO: [dpo@tethis-lab.com](mailto:dpo@tethis-lab.com)
- c) By regular mail, to the Data Controller's address.

The Data Controller also informs the Candidate that under the Privacy Regulations he/she has the right to file a complaint with the Garante. For the submission of the complaint, he/she may use the method he/she deems most appropriate, either by hand-delivering the complaint to the offices of the Garante (at the address below) or by sending:

- a) A registered mail with return receipt addressed to "Garante per la protezione dei dati personali", Piazza Venezia, 11, 00187 Rome;
- b) An e-mail at: [protocollo@gpdp.it](mailto:protocollo@gpdp.it), or [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it);
- c) A fax to: 06.696771.

For more information, please see the Garante's web page [www.garanteprivacy.it](http://www.garanteprivacy.it).

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