

# Grand Hotel et Des Palmes S.R.L.

## PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTS. 13 AND 14 OF GDPR 2016/679

We hereby inform you that the data you provide to us will be used exclusively for the recruitment activity in which you have decided to participate. Such data will be processed in compliance with applicable regulations, including Regulation (EU) 2016/679 "General Data Protection Regulation" ("GDPR"), as well as any further applicable provisions regarding the protection of personal data.

### 1. Controller and DPO Contact Details

The Data Controller is Grand Hotel Et Des Palmes S.r.l. (hereinafter also "Controller" or "Company") with registered office in Milan (MI), Viale Andrea Doria no. 7, 20124. You may contact the Data Controller by email at [info@mangias.com](mailto:info@mangias.com), or by ordinary mail at the address indicated above.

Furthermore, the Controller has appointed a Data Protection Officer ("DPO"), pursuant to Art. 37 of the GDPR. The DPO can be contacted at: [dpo.grandhoteletdespalmessrl@mangias.com](mailto:dpo.grandhoteletdespalmessrl@mangias.com)

### 2. Categories of Personal Data and Data Sources

The personal data you have provided concern, by way of example and without limitation, your name, address or other personal identification details, data relating to your educational background and professional experience.

Please note that, within your curriculum vitae, there may also be special categories of data as identified under Art. 9 of the GDPR (meaning data capable of revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, as well as trade union membership, data capable of revealing health status, sexual life or sexual orientation), provided by you for a better assessment of your position (e.g. data relating to membership of protected categories).

In any case, should you provide personal data that is not relevant or pertinent to the selection process, the Company will refrain from processing such data and will delete it immediately.

If the data was not obtained directly from you, the Company has received your data from recruitment agencies that collaborate with the Company (e.g. Michael Page, Glassdoor).

### 3. Purposes and Legal Basis of Processing

The personal data you have voluntarily provided to us will be processed, directly and/or through third parties, solely for the purpose of managing recruitment and personnel selection activities.

The processing of your personal data will therefore be carried out, in full compliance with applicable regulations, for the execution of pre-contractual measures taken at your request, pursuant to Art. 111-bis of Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018.

### 4. Methods of Processing

The processing of personal data is carried out for the purpose set out above, in accordance with Art. 5 of the GDPR, on both paper and electronic media, as well as by means of electronic or automated tools.

Processing is carried out directly by the Company, in its capacity as Data Controller, by its employees and collaborators who have been authorised to carry out personal data processing operations in connection with the provision of the requested services and have been instructed accordingly, as well as by external parties who, on behalf of the Company, provide various services as further specified in paragraph 7 below.

Your personal data will not be transferred outside the European Union and/or the European Economic Area ("EEA").

### 5. Nature of Data Provision and Consequences of Refusal

The provision of personal data referred to in this notice is necessary in order to participate in the selection process, and any refusal will make it impossible for the Controller to evaluate your application.

## 6. Data Retention Period

Data will be retained for a maximum period of 12 months from the submission of your curriculum vitae or from the date of the last update thereof as communicated to us. Upon expiry of this period, the data will be deleted or removed from the Company's active systems.

## 7. Recipients of Personal Data

Within the scope of the purposes indicated in point 3, your personal data may be communicated to the following categories of recipients. A complete list of such parties or categories of parties is available at the Controller's registered office.

- Controller's personnel responsible for managing the Selection process and data processors appointed from time to time (e.g. Aeroviaggi S.r.l.);
- Companies and/or agencies collaborating in the selection process (e.g. Michael Page, Glassdoor);
- Companies and professionals engaged by the Controller in the context of the selection process or for the purpose of protecting its own rights (for example, accountants, lawyers, tax consultants, auditors, consultants in the context of auditing or due diligence operations, etc.);
- Public authorities authorised by law, in the event of checks, investigations and/or inspections.

Your personal data will not be disclosed to the public.

## 8. Rights of the Data Subject

You have the right to exercise at any time the rights recognised under Arts. 15-21 of the GDPR, as briefly summarised below:

- **Right of access:** you may request information regarding the processing we carry out on your data, or confirmation that the Controller processes your personal data. In such case, you may ask us to provide a copy of your data and to verify which data we hold.
- **Right to rectification:** you have the right to ask us to rectify your personal data where it is inaccurate, including the right to request the completion of incomplete personal data.
- **Right to erasure:** you have the right to ask us to erase the data (or part of it) you have provided, including data whose retention is no longer necessary in relation to the purposes for which it was collected or otherwise processed.
- **Right to restriction of processing:** you may ask us to restrict the processing of your personal data where the legal conditions are met.
- **Right to object:** you may object to the processing of your personal data, subject to the existence of an overriding legitimate reason to continue such processing.
- **Right to data portability:** you may obtain from the Company, in a structured, commonly used and machine-readable format, the personal data you have provided to us, for the purpose of transmitting it to another party. This right applies where the Company processes such data by automated means, on the basis of consent or for the purpose of providing services.
- **Withdrawal of consent:** where processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out prior to such withdrawal.
- **Right to lodge a complaint with the Supervisory Authority:** without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent Supervisory Authority if you believe that the processing carried out infringes applicable data protection law.

Any requests submitted in exercise of your rights may be forwarded to the Controller and the DPO by writing to the email addresses indicated in paragraph 1 of this notice.