

INFORMATION ON THE PROCESSING OF PERSONAL DATA EX ART. 13 REGULATION (EU) 2016/679 (GDPR) - USERS

Introduction

CVing is an Employment Agency (Aut. Prov. ANPAL n. R.0000059 of 26-05-2021) that provides personnel search and selection services.

CVing offers its services through a web platform that can be used remotely by users, in "software as a service" modality, with the aim of digitalizing the application phase for users and making the personnel selection process more efficient for companies and recruiters.

In compliance with EU Regulation 2016/679 and the Italian code on the protection of personal data (Legislative Decree 196/2003 as amended by Legislative Decree 10 August 2018, n.101), regarding the processing of personal data please note that:

Data Controller

The data controller of the data provided by the user for the creation of the account and for the content freely uploaded by the user in the same account is CVing S.r.l., with registered office in Via Enrico Caviglia 3A, 20139 - Milan (MI), that can be contacted at privacy@cving.com

If the user applies for a specific position, the data controller for the specific application is the business to which the application is made, whose information on the processing of personal data will be available in the form indicated by the same business.

Data Protection Officer (D.P.O. - R.P.D.)

CVing has appointed a Data Protection Officer, also called DPO (Data Protection Officer), who you can contact by writing to dpo@cving.com

Purposes, legal basis of data processing and nature of data conferment

Cving, in its capacity as a Work Agency, may process the user's personal data for multiple purposes, in part related to the tool with which CVing carries out its personnel search and selection activities. In particular:

1. Registration to the platform and use of CVing services

In order to use the services offered by CVing, including the search and selection service, the user must provide certain personal data in order to create the account required to use the platform.

The legal basis is found in art. 6, paragraph 1, lett. b) EU Reg. 2016/679, and is constituted by the contract signed by the user through acceptance of the "Terms and Conditions" for the use of the platform, to which please refer; for certain features of the platform (e.g. CVingCoin accumulation) the data may be processed according to the terms established by the regulations governing such features.

Providing the personal data requested during registration is mandatory in order to access the services offered by CVing; failure to provide such data will make it materially impossible to use the functions of the site and the platform.

2. Adding user profile and acquiring additional data for the search and selection service

The user can also independently enrich his personal profile, using the platform features that allow him to upload within the platform, also with reference to the job positions available, other personal data (e.g. his CV); further data may also be requested and acquired using different channels (e.g. through an e-mail request from the Data Controller), where necessary, with the user's consent (e.g. references from previous employers). In both cases, such personal data will be processed for purposes connected or instrumental to the activity of search and selection of candidates regarding to one or more working positions.

Any personal data provided that can be traced back to special categories of data under Art. 9 EU Reg. 2016/679 (e.g. health status, belonging to protected categories under l. 68/1999) will be processed only where necessary and relevant for the assessment of the application in relation to specific job positions; any data relating to criminal convictions and offenses under Art. 10 Reg. EU 2016/679 may be processed only if required by law.

The legal basis is found in Art. 6(1)(b) EU Reg. 2016/679, and consists of the performance of pre-contractual measures taken at the request of the data subject, as well as, with regard to data included under the special categories referred to in Art. 9 EU Reg. EU 2016/679, in the necessity of fulfilling the obligations and exercising the specific rights of the data controller or the data subject in the field of labor and social security law and social protection, insofar as it is authorized by Union or Member State law or by a collective agreement under the law of the Member States, in the presence of appropriate safeguards for the fundamental rights and interests of the data subject, pursuant to Art. 9(2)(b) EU Reg. 2016/679; with regard to the data referred to in Art. 10 EU Reg. 2016/679, the legal basis is found in Art. 10

EU Reg. 2016/679 and Art. 2-octies D. Lsg. 101/2018.

Normally, the provision of personal data for this purpose is optional, and failure to provide such data will not in any case result in the impossibility to access the services of the platform; however, failure to provide some personal data (e.g. your CV) may preclude CVing from providing the search and selection service.

Moreover, the provision of some personal data (e.g. your CV) may sometimes be mandatory to apply for a specific job position; in this case, failure to provide such data implies the impossibility to proceed in the application process for the specific job position.

3. Improvement of platform functionality

The personal data in the user profile, as well as any material produced in relation to a specific application, may be processed, even in aggregate form but in any case within a process of appropriate anonymization, to conduct research, for

statistical purposes and to improve the functionality of the platform; the legal basis for the processing is Article 6(1)(b) of EU Reg. 2016/679, i.e. the contract signed by the user through acceptance of the "Terms and Conditions" for the use of the platform, to which reference is made.

4. Security and Investigations

CVing will process user data to investigate possible violations of the terms of use of its services and in case investigations are necessary for the purposes of user safety and security. The legal basis for the processing is Article 6(1)(f) of EU Reg. 2016/679, i.e. CVing's legitimate interest in preventing abuse or fraud in the use of the services offered.

5. Legal obligations

CVing will also process users' personal data in order to comply with specific legal requirements, and may have to disclose such personal data to third parties where required to do so by law, by order of a judicial authority or as part of legal proceedings, in order to protect the rights of users, CVing or third parties. If it is deemed appropriate in good faith, CVing undertakes to inform users of requests to communicate data concerning them, unless prohibited by law or by an order of an Authority. The legal basis for the processing is Article 6(1)(c) of EU Reg. 2016/679.

6. Other

CVing may process the user's personal data for other aims (such as, for example, the sending of commercial communications, newsletters...); for these further aims the user will be asked to consult the specific information regarding these services, and, where necessary, the user's specific consent in relation to such processing will be acquired.

Modalities of data processing

The data provided will be processed both by computer and, potentially and where necessary, by paper. In both cases are provided and adopted adequate security measures, as required by law on the protection of personal data.

Personal data retention period

CVing will store personal information that users provide regarding their profile and activities until the user decides to erase his account and as long as it is needed to provide the services requested.

Following account deletion, user data will be retained for a minimum technical period to allow CVing to perform the necessary operations for their deletion, around 72 hours.

In case of inactivity of the user, personal data will be permanently deleted after 48 months from the last activity, except for the possibility of the data subject to request cancellation at any time.

In order to ensure appropriate safeguards for you, CVing may periodically update its database (e.g. by sending e-mail to users containing the link to the policy and clear information about the possibility of opt-out and deletion from the database); from this update the retention terms will become effective again.

CVing may store personal information about its users after their accounts have been terminated if CVing reasonably believes that storage is necessary to comply with legal requirements, settle disputes, maintain security, enforce contracts, or fulfill specific user requests beyond the service provision.

Categories of recipients of personal data

Personal data may be communicated to subjects operating as autonomous controllers (including CVing's client companies, as well as professionals, public bodies, auditing or supervisory bodies), also in execution of legal obligations, or processed, on behalf of the Company, by subjects designated as Data Processors to whom appropriate operating instructions are given; the complete list of Data Processors is available upon request by the data subject, to be sent to the email privacy@cving.com.

Data relating to the progress status of certain activities that you may decide to carry out within the platform and related to specific features of the platform may also be viewed by other users of the platform.
Such eventuality will be notified the user in advance.

Extra-EU data transfer

CVing mainly processes data within the European Union and/or the European Economic Area.
Where strictly necessary, CVing may transfer personal data to third countries; in the event that such a transfer takes place, CVing ensures that the transfer and processing of personal data takes place in accordance with the conditions imposed by EU Reg. 2016/679 (art. 44 et seq.), such as Commission adequacy decisions, standard contractual clauses or other measures considered appropriate.

Subjects authorized to the data processing

The data may be processed by employees of the company departments or third parties assigned to the pursuit of the above-mentioned purposes, who have been expressly authorized to process the data and have received adequate operating instructions.

Rights of the data subject

The user can ask CVing for access to his personal data, their rectification or erasure, the integration of incomplete data, the limitation of processing in the

cases provided for by art. 18 EU Reg. 2016/679; to receive in a structured, commonly used and machine-readable format the data, as well as, if technically possible, to transmit them to another controller without impediments in case the conditions for the exercise of the right to portability under Art. 20 EU Reg. 2016/679 are present (the processing is based on consent pursuant to Art. 6 paragraph lett. a) or Art. 9 paragraph 2, lett. a) of EU Reg. 2016/679 or on the contract pursuant to Art. 6 paragraph 1, lett. b) of EU Reg. 2016/679 and is carried out with automated tools).

These rights can be exercised by writing to privacy@cving.com.

If the user believes that the processing of his personal data carried out by CVing is in violation of the provisions of EU Reg. 2016/679, he has the right to file a complaint with the Italian Data Protection Authority (art. 77 EU Reg. 2016/679) or to take appropriate legal actions (art. 79 EU Reg. 2016/679).

This Privacy Policy is effective as of 06/08/2021.

CVing S.r.l. reserves the right to partially or fully modify the Privacy Policy or change its content.

In the event of any conflict between the provisions of the Italian language version and the provisions of the English language version of this document, the provisions of the Italian language version shall prevail.

Any updates will be published on this website.