



Telepass S.p.A. – Information notice for candidates

## INFORMATION NOTICE pursuant Article 13, Regulation (EU) 2016/679 (“GDPR”)

By means of this information notice the Data Controller, as defined below, wish to inform You on the purposes and methods of the processing of Your personal data and on the rights that Regulation (UE) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data entrust You.

### 1. WHO IS THE DATA CONTROLLER

**Telepass S.p.A.**, with registered office in Via Alberto Bergamini, 50, Roma, in person of its legal representative *pro tempore*, is the Data Controller of your personal data (“**Data Controller**” or “**Telepass**”).

### 2. DATA PROTECTION OFFICER

The Data Controller has appointed a Data Protection Officer (“**DPO**”) that You could reach out sending an email to the following address [DPO@telepass.com](mailto:DPO@telepass.com) or writing to the following address:

Data Protection Officer (DPO)

c/o Telepass S.p.A.

Via Alberto Bergamini, 50

00159 – Roma (RM)

### 3. WHAT DO WE MEAN FOR PERSONAL DATA

Under the GDPR, personal data is defined as: “*any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*” (“**Data**”).

### 4. INFORMATION REGARDING THE PROCESSING ACTIVITIES AND THE LEGAL BASIS FOR THE PROCESSING

Within the selection process, with the aim of evaluating your professional references, Telepass shall process the Data included in your *curriculum vitae*, and published on Your LinkedIn personal profile, for purposes strictly connected to the recruiting and the assessment of Your application.

In particular, for the above mentioned purposes, Telepass shall collect and process – *inter alia* – the following Data:

- first name, surname, date and place of birth;
- address, telephone number and e-mail;
- education, work experiences;
- language and computer skills
- any other relevant information to assess Your application



In any event, the Data Controller is committed to ensure that the information collected and processed is appropriate for the purposes as described above, and that this does not involve an invasion of Your privacy.

Your Data is processed in compliance with the applicable law and solely for the purpose of recruiting in the interest of the Data Controller and its subsidiaries.

The Data and information provided in Your *curriculum vitae* are processed under Article 111-bis Legislative Decree 196/2003 (“**Privacy Code**”) as last modified by Legislative Decree 101/2018 and under Article 6, par. 1, lett. b), GDPR, in order to take steps at the request of the data subject prior to entering into a contract.

With the exception of your personal picture, the provision of Your Data is voluntary; however, in the event you refuse to provide the Data, it would not be possible for the Data Controller to review your application.

## **5. TO WHICH SUBJECTS YOUR PERSONAL DATA MAY BE COMMUNICATED AND WHO MAY GET TO KNOW THEM**

Telepass may disclose Your Data to its parent company Atlantia S.p.A. which, in the light of the service agreement signed with Telepass, shall perform any activity related to the receipt, the assessment and the selection of the applications.

For the above mentioned processing activities, Atlantia S.p.A. has been appointed as Data Processor by the Data Controller.

The list of Data Processors is kept up-to-date by the Data Controller and it is available for consultation sending an email to the following address [privacy@telepass.com](mailto:privacy@telepass.com) or reaching out to the DPO writing to the address indicated in paragraph 2 above.

The Data Controller may communicate Your Data to its subsidiaries, which will process them as independent data controllers for the same purposes of recruitment and selection of its personnel as referred to in paragraph 4 above.

Your Data shall not be subject to any kind of dissemination to unidentified subjects.

## **6. APPLICABLE RETENTION PERIOD**

Telepass will process Your Data for a period consistent with the purposes set out in paragraph 4 above, in accordance with the principle of minimisation. In particular, Telepass will process Your Data for 24 months from the date in which your *curriculum vitae* has been received, or since the last update; thereafter your personal data will be definitely deleted.

## **7. YOUR RIGHTS AS DATA SUBJECT**

At any point while Telepass is in possession of or processes your Data, You, the data subject, have



the following rights:

- Right of access – you have the right to obtain confirmation as to whether or not your personal data is being processed, and, where that is the case, the right to access to the personal data and to receive any information regarding said processing;
- Right of rectification – you have the right to obtain without undue delay the rectification of your personal data, should it be inaccurate or incomplete;
- Right to erasure – in certain circumstances, you have the right to obtain the erasure of your personal data from our records;
- Right to restriction on processing – provided that certain conditions apply, you have the right to obtain restriction of the processing of your personal data;
- Right of portability – you have the right to have your personal data we hold transmitted to another data controller;
- Right to object – you have the right to object to the processing of your personal data;
- Right to lodge a complaint before the Supervisory authority - should UMBRA refuse to follow up to your request to exercise your rights as provided for by the GDPR, UMBRA shall provide you with the reason underpinning said refusal. If need be, you have the right to lodge a complaint as set forth under paragraph 6 below.

Should you intend to exercise your rights as provided for by the GDPR, please contact Telepass at the following dedicated email address [privacy@telepass.com](mailto:privacy@telepass.com) or reaching out to the DPO writing to the address indicated in paragraph 2 above.

The exercise of your rights as data subjects is free of charge in accordance with Article 12, GDPR.

## **8. COMPLAINTS**

Should you wish to file a motion as to how your Data is being processed by Telepass, or as to how your complaint has been handled, you have the right to lodge a complaint directly before the Supervisory authority.

## **9. AMENDMENTS**

The Data Controller reserves the right to amend and update this information in time.

Last modified [December 2019].