

Information on the Processing of Personal Data pursuant to Article 13 of EU Regulation No. 2016/679 “General Data Protection Regulation” (hereinafter referred to as “GDPR”) and Legislative Decree No. 196/2003 as amended by Legislative Decree No. 101/2018

With this privacy notice, we would like to inform you about how our company, ALF S.R.L. (hereinafter referred to as the Company or ALF), processes the personal data you have provided through your Curriculum Vitae. This notice is published on the website alfcreative.it, under the Privacy Policy section. Unless otherwise specified, all legal references in this document pertain to the GDPR.

1. Data Controller

The Data Controller is the company ALF S.R.L., with its registered office at Via Luigi Einaudi, 7, in Alba (CN - 12051), VAT number 03915050045, and can be contacted by phone at +39 0173 592970.

2. Appointment of RDP – DPO

The Data Controller, not falling within the cases indicated in Article 37, nor in those indicated in the various interpretations of the Supervisory Authority, has deemed it unnecessary to appoint a Data Protection Officer.

3. Subject of the Processing

We emphasize that the relevant legislation concerns exclusively personal data, that is, only data that can be traced back to NATURAL persons (Art. 2, paragraph 1 and Art. 4, paragraph 1), and not legal entities.

The processing concerns personal, identifying, and contact data (for example, name, surname, educational qualifications, address, phone number, email, educational and work curriculum, achievements, certificates, and other information, including sensitive data that may appear on your Curriculum Vitae), hereinafter referred to as “personal data,” which you provided when applying to the Data Controller.

4. Purpose of Processing, Legal Basis, Nature of Data Provision

The purpose of the processing referred to in point 3 is to enable the inclusion of your name in a selection process. The voluntary submission of your Curriculum Vitae is considered specific consent for this purpose, with the assurance that the Data Controller will process the data contained therein solely for selection activities. The processing is therefore lawful pursuant to Article 6(1)(a) and Article 9(2)(a) of the GDPR.

The provision of data is entirely voluntary, but the completeness of the data significantly affects the selection process.

5. Methods of Processing, Duration of Processing

The processing of your personal data is carried out by means of the operations indicated in Article 4(2) of the GDPR, namely: collection, recording, organization, storage, consultation, use, blocking, communication, deletion, and destruction. Your personal data are processed both in paper form and electronically and/or through automated means.

All data you provide in this context will be stored in our archives:

1. For a period limited to the duration of the selection process if your application was submitted to the Data Controller in relation to a specific position opened by the Data Controller (unless you indicate otherwise).
2. For a period of 15 years if your application was spontaneously submitted to the Data Controller for the purpose of a general selection for undefined/unsolicited positions.

6. Data Access

Your data may be made accessible, solely for the purposes referred to in point 4, to employees, collaborators, and partners of the Data Controller, in their capacity as authorized data processors and/or system administrators, or to third-party companies or other entities performing outsourcing activities on behalf of the Data Controller, in their capacity as external data processors. The policies adopted by ALF provide for a careful selection of internal and/or external subjects who may have access to your Company's data, based on their skills and full compliance with the security and confidentiality rules imposed by ALF.

7. Data Communication

Without the need for explicit consent (pursuant to Article 6 letters b) and c) of the GDPR), the Data Controller may communicate your data referred to in point 3 to supervisory bodies, judicial authorities, as well as to those subjects to whom communication is mandatory by law for the fulfillment of the purposes outlined in point 4 or for specific purposes of the requesting entities.

These entities will process the data in their capacity as independent data controllers. Such data will not, however, be disclosed by ALF.

8. Data Transfer

The personal data provided, as referred to in point 3, are stored in electronic and/or paper format on servers and/or in physical archives located at the Data Controller's premises, within the European Union. It is understood, however, that ALF may, if necessary, move archives and servers to other countries within the EU or even outside the EU, for example, when using Cloud services. In such cases, the Data Controller hereby assures that the transfer of data outside the EU will comply with applicable legal provisions, following the execution of the standard contractual clauses established by the European Commission, and that the Cloud service used will guarantee an adequate level of security to ensure the confidentiality, integrity, and availability of the transferred data.

9. Data Subject Rights

ALF guarantees your Company the exercise of the rights provided by the legislation for data subjects and ensures cooperation in response to specific requests from data subjects. However, ALF does not guarantee (unless otherwise agreed with your Company) the direct exercise of rights by data subjects. In case of such requests, ALF will simply forward the request from the data subject to your Company. Data subjects enjoy the rights provided under Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR. In detail:

1. Right of access
2. Right to rectification
3. Right to erasure ("right to be forgotten")
4. Right to restriction of processing
5. Right to notification obligation in case of rectification or erasure of personal data or restriction of processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision-making concerning natural persons, including profiling

10. Methods for Exercising Data Subject Rights

Any data subject may exercise their rights at any time by sending:

1. A registered letter with return receipt addressed to the Data Controller, as indicated in point 1;
2. An email to privacy@alfcreative.it.

ALF SRL