



Complete Information for Job Applicants

Who we are and what we do with your personal data?

TYKELAB S.r.l. (CY4Gate group), with registered office at Via Benedetto Croce n. 19 - 00142 Rome (RM), (hereinafter referred to as the "Data Controller"), is committed to safeguarding the confidentiality of your personal data and ensuring it is protected from any event that may risk its violation.

The Data Controller implements policies and practices regarding the collection and use of personal data, as well as the exercise of rights that you are entitled to under applicable law. The Data Controller ensures that the policies and practices adopted for the protection of personal data are updated whenever necessary, especially in the event of regulatory and organizational changes that may affect the processing of your personal data.

The Data Controller has appointed a Data Protection Officer (DPO) whom you can contact if you have any questions about the policies and practices adopted.

You can contact the DPO at the following address:

privacy@tykelab.it

How and why the Data Controller collects and processes your personal data?

The Data Controller collects and/or receives information concerning you, such as:

- name, surname, tax code, VAT number, images, email, phone number, address, date of birth
- data related to health status if the individual belongs to protected categories
- curriculum data, including any image attached to the CV
- data related to criminal convictions, judicial authority provisions where required by law

The personal data concerning you will be processed for the following purposes:

1) the selection of personnel and/or the initiation of a collaboration

Purpose	Legal basis
<ul style="list-style-type: none"> - the search for candidates for open positions -the collection of applications and resumes, which may occur through: job advertisements disseminated via recruitment agencies, temporary employment agencies, universities, postings in newspapers, magazines, specialized journals, and the official website - the review of received resumes - the organization of selection interviews -the integration of the successful candidate into the organizational context of the Data Controller -the establishment of the employment/collaboration relationship 	<p>Conducting pre-contractual activities</p> <p>Fulfillment of specific obligations</p> <p>Execution of specific tasks arising from laws, regulations, or collective agreements, including company-specific ones, particularly for the purpose of establishing the employment and/or collaboration relationship.</p>

Your data may also be collected from third parties, such as, by way of example:

- other data controllers, e.g., other companies in the group
- IT service providers
- private entities engaged in labor supply, intermediation, recruitment and selection of personnel, training, and activities supporting professional redeployment
- universities

Where applicable, the right to rectify the processed or collected data is reserved.

The data collected or otherwise obtained by the Data Controller as a result of the established selection procedure for available positions within its organization, except for those related to health status that you voluntarily provide, are considered necessary, and failure to provide them will make it impossible for the Data Controller to proceed with the activities aimed at:

- evaluating your application in the personnel selection process that the Data Controller follows, also through its suppliers (third parties/recipients)
- managing the candidate selection process in all its stages and the obligations that arise from it.

2) for communication to third parties and for dissemination



Purpose	Legal basis
communication to third parties such as: - private entities engaged in labor supply, intermediation, recruitment and selection of personnel, training, and activities supporting professional redeployment - universities - information and IT assistance companies	Conducting pre-contractual activities Fulfillment of legal and/or regulatory obligations arising from the activities carried out during the selection procedure.

The Data Controller does not transfer your personal data abroad (to non-EU countries). Your personal data will not be disseminated or disclosed to unspecified and unidentified parties, including third parties.

The communication pertains to the categories of data whose transmission is necessary for carrying out the activities and purposes pursued by the Data Controller in managing the selection procedure. The related processing does not require the consent of the data subject when it occurs to fulfill obligations arising from the established relationship or if other exclusions apply (in particular, the tracing of a legitimate interest of the Data Controller), expressly provided for or arising from the laws and regulations applicable to the Data Controller, or through identified third parties acting as data processors.

Where communication involves data capable of revealing health status, the relevant processing operations will be conducted with all necessary safeguards, including those that, if required based on the identified risks, result in the application of pseudonymization, aggregation, and/or encryption solutions for the data.

3) for intercompany communications

Purpose	Legal basis
The search for candidates for open positions also for other companies in the CY4Gate Group	Consent

4) for cybersecurity activities

Purpose	Legal basis
-control and monitoring of services exposed on the network and on the platforms relevant to the Data Controller, made available to you for submitting resumes and/or accessing open job/collaboration positions (e.g., forms published on the "Jobs" page) - implementation of procedures for detecting and notifying personal data breaches (data breach)	Fulfilment of legal obligations (detection and notification of data breach events) Legitimate interest

How, where, and for how long your data are stored?

How

Data processing is carried out through paper records or IT procedures by specifically authorized internal personnel. Access to your personal data is permitted to the extent and within the limits necessary for performing the processing activities related to you.

The Data Controller periodically checks the tools used to process your data and the security measures in place, ensuring they are continuously updated. The Data Controller also verifies, through authorized personnel, that personal data that is not necessary for processing or whose purposes have been fulfilled are not collected, processed, stored, or retained. Furthermore, it ensures that data are stored with guarantees of integrity, authenticity, and usage for the purposes of the actual processing activities carried out, especially considering their particular nature. These checks allow the Data Controller to assess the relevance, non-excessiveness, and indispensability of data belonging to special categories in relation to the selection process and the relationship to be established, including any data you provide voluntarily.



The Data Controller guarantees that data identified as excessive or irrelevant following these checks will not be used, except for possible retention, as required by law, of the document or record containing them.

Where

Data are stored in paper, digital, and electronic archives located within the European Economic Area, with specific security measures ensured.

How long

Your personal data are retained for the time necessary to carry out the activities related to you.

In particular:

identifying data curricular data data capable of revealing health status, even if voluntarily provided	Duration of the selection procedure and in any case no longer than 24 months. The following provisions apply: - the limitation of processing and the other safeguards provided for data belonging to special categories - the deletion of personal data collected through spontaneously submitted resumes or in the absence of an open position - the Data Controller's interest in retaining the data, including any voluntarily provided by you, for the necessary time to evaluate the application for potential future employment/collaboration opportunities -the establishment of the employment/collaboration relationship Except in the case of potential litigation, which may extend the aforementioned terms for the time necessary to pursue the related purpose.
IT data (access logs to systems and the network and/or IP addresses)	The duration of retention depends on the presumed and/or detected risk and the detrimental consequences that may arise, subject to measures to anonymize the data or limit their processing. In any case, the data must be retained (starting from the knowledge/detection of the danger event or data breach) for the time necessary to notify the supervisory authority of the identified data breach through the procedures implemented by the Data Controller and, in any case, to remedy it.

Once all the purposes that justify the retention of your personal data have been exhausted, the Data Controller will ensure that they are deleted or made anonymous.

What are your rights?

The rights that are recognized to you allow you to always maintain control over your data. Your rights include:

- Access
- Rectification
- Revocation of consent
- Deletion
- Restriction of processing
- Objection to processing
- Portability

In essence, at any time and free of charge and without particular charges or formalities for your request, you can:

- Obtain confirmation of the processing carried out by the Data Controller.



- Access your personal data and know its source (when the data is not obtained directly from you), the purposes and aims of the processing, the data of the subjects to whom it is communicated, the retention period of your data or the criteria useful for determining it.
- Update or rectify your personal data so that it is always accurate and correct.
- Revoke consent at any time if it constitutes the basis for processing. The revocation of consent does not affect the lawfulness of the processing based on the consent performed prior to the revocation.
- Delete your personal data from databases and/or archives, including backups, in cases where, among others, they are no longer necessary for the purposes of processing or if the processing is deemed unlawful, and as long as the conditions provided by law are met; and in any case if the processing is not justified by another equally legitimate reason.
- Limit the processing of your personal data under certain circumstances, for example, where you contest its accuracy, for the period necessary for the Data Controller to verify its accuracy. You must be informed, in a timely manner, also when the suspension period has expired or the reason for the limitation of processing has ceased, and thus the limitation itself is revoked.
- Obtain your personal data if their processing is based on a contract and carried out with automated tools, in electronic format, also for the purpose of transmitting them to another data controller.

The Data Controller must proceed in this manner without delay and, in any case, no later than one month from the receipt of your request. The term may be extended by two months if necessary, considering the complexity and number of requests received. In such cases, the Data Controller will inform you within one month from the receipt of your request and will provide you with the reasons for the extension.

For further information and to send your request, please write to comunicazioni@pec.tykelab.it

How and when can you oppose the processing of your personal data?

For reasons related to your particular situation, you may at any time oppose the processing of your personal data if it is based on legitimate interest, by sending your request to comunicazioni@pec.tykelab.it

You have the right to delete your personal data if there is no legitimate reason prevailing over the one that originated your request.

Whom can you file a complaint with?

Without prejudice to any other administrative or judicial action, you can file a complaint with the data protection authority, unless you reside or carry out your work in another Member State. In that case, or if the violation of data protection law occurs in another EU country, the competence to receive and handle the complaint will rest with the supervisory authorities established there.

Any updates to this notice will be communicated to you promptly and by appropriate means, and you will also be informed before proceeding, in time to give your consent if necessary.

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I authorize TYKELAB S.r.l. to transmit my personal data to the other companies of the CY4Gate S.p.A. group of which it is a part, for the purpose of personnel evaluation and selection, in compliance with the General Data Protection Regulation (GDPR).

Date

Name

Signature