PRIVACY NOTICE – CANDIDATES

Information notice pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR)

This privacy notice applies to candidates of Pixel Moda S.r.l. ("**Candidate**", "**You**", "**Your**").

1. DATA CONTROLLER

The data controller is the Italian company **Pixel Moda S.r.l.**, with registered office at Via Ettore Ponti 46 – 20146 Milan (MI), Italy, Tax Code/VAT no. 12088950964 (hereinafter the "**Data Controller**" or "**Controller**" or "**Pixel Moda**").

The Data Controller may be contacted as follows:

- by email at: privacy@pixelmoda.net
- by certified email (PEC) at: pixelmoda@pec.it

The Data Controller has appointed a Data Protection Officer ("DPO"), pursuant to Article 37 of Regulation (EU) 2016/679 (GDPR).

The Data Protection Officer may be contacted at the following email address: dpo@pixelmoda.net

2. CATEGORIES OF PERSONAL DATA PROCESSED

We may process the following personal data relating to you:

- Identification and contact data (email address and mobile phone number);
- Data relating to professional skills and career and, more generally, the data contained in your CV;
- Image and voice of the Candidate recorded in a presentation video;
- Personal website;
- Portfolio;
- Data contained in cover letters.

We may also process the following special categories of personal data:

- Special categories of data such as disability/incapacity status, illness, pregnancy, injury, health data relating to fitness for specific jobs, membership of protected categories, etc.

3. METHODS OF DATA COLLECTION

Your personal data may be collected by the Data Controller through one of the following sources:

- The Data Controller's website, through the "Careers" section dedicated to applications;
- Application submitted via LinkedIn;
- Application submitted via email to the Data Controller;
- Other application methods (e.g. via the Data Controller's social media channels).

4. PURPOSES AND LEGAL BASIS OF THE PROCESSING; NATURE OF DATA PROVISION

PURPOSES	LEGAL BASIS	NATURE OF DATA PROVISION
Compliance with legal obligations: The processing is carried out for the purpose of complying with obligations imposed by laws, regulations, collective bargaining agreements and, more generally, by the legislation applicable from time to time to the employment relationship.	The processing is necessary to comply with a legal obligation to which the Data Controller is subject (Article 6(1)(c) GDPR) and Article 9(2)(b) GDPR where special categories of data are processed.	The provision of the data is mandatory. Failure to provide the requested data or providing inaccurate data may result in the impossibility to establish and/or continue the employment relationship with the Data Controller.
Selection and assessment of the Candidate's professional profile: The processing is carried out for the purpose of reviewing the application and contacting the Candidate.	The processing is necessary for the performance of a contract to which the Candidate is a party or for the implementation of pre-contractual measures taken at the request of the Candidate (Article 6(1)(b) GDPR); the processing is also necessary to comply with obligations and exercise specific rights of the Data Controller or the data subject in the field of employment law, social security and social protection.	The provision of the data is mandatory. Failure to provide the requested data or providing inaccurate data may result in the impossibility of being assessed for a position by the Data Controller.
Retention of the Candidate's CV: The processing is carried out for the purpose of retaining the Candidate's CV in the event that the application is unsuccessful, in order to re-evaluate it in the future, possibly for different or new job positions.	The processing is based on the legitimate interest of the Data Controller (Article 6(1)(f) GDPR).	The provision of the data is optional. Failure to provide the data may result in the impossibility of being considered for future positions by the Data Controller.

5. DATA RETENTION PERIOD

The data will be processed and stored for the entire period during which the position for which the application was submitted remains open.

In the event of the establishment of an employment or collaboration relationship following a successful application, reference is made to the specific privacy notice provided by the Data Controller.

Thereafter, the data will be retained for two (2) years following the end of the selection process, taking into account the frequency of availability of new job positions, or for a period of five (5) years for the purpose of defending the Data Controller's rights in judicial proceedings.

The Data Controller undertakes to process personal data in accordance with the principle of data minimisation, annually verifying the need to retain the data for a period not exceeding what is necessary for the purposes for which they were collected and processed. The Data Controller may retain the data in order to comply with legal obligations or to exercise or defend any right or claim in judicial proceedings. Once the purposes for which the data were collected and processed have been achieved, the Data Controller will implement appropriate measures to anonymise the data so that the data subject can no longer be identified.

6. RECIPIENTS OF THE DATA

The data may be processed by employees and collaborators of the Data Controller who are expressly authorised to do so, acting on the basis of specific instructions and adopting appropriate measures to ensure data protection, in relation to all the purposes set out in this notice.

The data may also be disclosed to – and processed, depending on the circumstances, as independent data controllers or as duly appointed data processors – the following categories of recipients (the updated list of external data processors is available upon request by writing to the Data Controller):

- IT service providers, including digital solution providers, system and database managers, as well as IT consultants providing technical assistance;
- Companies belonging to the same corporate group as the Data Controller, including their internal resources (employees and collaborators);
- Accounting and tax consultants, legal advisors, payroll processing firms or offices;
- Central and local public authorities and their peripheral offices, where required by law;
- Public and private healthcare facilities, occupational physicians and bodies responsible for the management of workplace injuries;
- Judicial and public security authorities;
- Banks, financial intermediaries and custodian banks;
- Insurance companies, pension funds, social security and welfare institutions.

7. TRANSFER OF DATA TO NON-EU COUNTRIES

Personal data may be transferred to countries outside the European Union, for example where a service provider appointed as data processor is located in a third country.

The Data Controller will carry out international data transfers only where necessary and always ensuring a level of protection compliant with the GDPR, in particular:

a. to countries for which the European Commission has adopted an adequacy decision pursuant to Article 45 GDPR; or
b. by applying the appropriate safeguards provided for under Article 46 GDPR, including the Standard Contractual Clauses adopted by the European Commission, which ensure adequate protection for data transferred outside the EEA.

8. METHODS OF DATA PROCESSING

The data are processed in accordance with the principles of fairness, lawfulness and transparency, using both manual and automated tools and by means of paper and electronic media.

Processing is always carried out within the limits of the purposes indicated in this notice and by adopting appropriate measures to ensure data security, integrity and confidentiality.

9. RIGHTS OF DATA SUBJECTS

The data subject may exercise at any time the rights provided for in Articles 12–22 of the GDPR, within the limits and under the conditions set out therein, by sending a request to the Data Controller or to the Data Protection Officer at the addresses indicated in this notice.

These rights include:

- **Right of access** (Article 15 GDPR): to obtain confirmation as to whether or not personal data concerning them are being processed and access to such data;

- **Right to rectification** (Article 16 GDPR): to obtain the correction of inaccurate data and the completion of incomplete data;
- **Right to erasure** (Article 17 GDPR): to request the deletion of personal data when they are no longer necessary for the purposes for which they were collected, in the event of withdrawal of consent, objection to processing, unlawful processing, or where there is a legal obligation to erase them;
- **Right to restriction of processing** (Article 18 GDPR): to obtain restriction of processing where the conditions laid down in the GDPR apply;
- **Right to object** (Article 21 GDPR): to object at any time to processing based on the Data Controller's legitimate interest, unless the Data Controller demonstrates compelling legitimate grounds or the need to process the data for the establishment, exercise or defence of legal claims;
- **Right to data portability** (Article 20 GDPR): to receive personal data provided to the Data Controller in a structured, commonly used and machine-readable format and to transmit them to another controller, where the processing is based on consent or a contract;
- **Right to lodge a complaint with a supervisory authority** (Article 77 GDPR): to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, https://www.garanteprivacy.it/) or to bring the matter before the competent courts, if the data subject considers that the processing infringes applicable law.

Where processing is based on consent, the data subject has the right to withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.