

PRIVACY NOTICE Job Applicants

Information Notice pursuant to Articles 13 and 14 of the EU Regulation 2016/679 (GDPR)

Dear Candidate,

This privacy notice is provided in accordance with Articles 13 and 14 of the European Regulation 2016/679 (hereinafter also "GDPR" or "Regulation") to individuals expressing interest in potential employment or collaboration opportunities with Adelaide Hotel Srls.

1 Identity and contact details of the Data Controller:

The Data Controller is **Adelaide Hotel Srls** (hereinafter also referred to as "**Controller**" or "**Adelaide Hotel**"), with registered office at Via Emilia Est 1581, 41122 Modena (MO), Italy, VAT No. 03735130365.

Contacts

Tel: +39 059 283600

E-mail: amministrazione@rechigiparkhotel.it

2 Categories and types of data processed:

The data collected and processed by Adelaide Hotel are those provided by the data subject when completing the *Work with us* form on the website and submitting their Curriculum Vitae, which may include:

- Ordinary personal data, such as personal information (name, surname, date of birth, address, image, gender, tax code, VAT number, etc.), contact details (telephone number, e-mail address, etc.), employment history, professional qualifications, and educational background.
Although Adelaide Hotel does not explicitly request "sensitive data", your Curriculum Vitae may contain such information. For this reason, in order to evaluate your profile, we require your explicit consent to process them.
- Special categories of personal data, as defined under Article 9 of the EU Regulation 2016/679, which may reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, and data concerning health, sex life, or sexual orientation.

3 Purpose and legal basis of processing:

The personal data provided by the candidate and collected by Adelaide Hotel will be processed for the following purposes:

- a) To assess the suitability of your profile for the requested position or for any open roles, and more generally for managing recruitment and selection procedures;
- b) To contact you for scheduling interviews using the contact details you have provided;
- c) To perform contractual and/or pre-contractual obligations should a collaboration begin;
- d) To comply with legal obligations of an administrative, accounting, civil, or tax nature, as well as with applicable EU or non-EU regulations.

Processing of the data contained in your Curriculum Vitae is lawful under the following legal bases:

- The data subject has provided **explicit consent** for specific purposes, especially when processing special categories of personal data (Article 6(1)(a) of the EU Regulation 2016/679);
- The processing is necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a **contract**;
- The processing is necessary for **compliance with a legal obligation** to which the Controller is subject;
- The processing is necessary for the **legitimate interests** of the Controller, namely assessing the

candidate's suitability for the open position and potentially contacting the candidate to schedule interviews or meetings.

Processing of special categories of data will only occur in accordance with Article 9(2)(a) of the Regulation, subject to the explicit consent of the data subject and in compliance with current authorizations issued by the data protection authorities.

If such data are not strictly necessary, we kindly ask you not to include them. Should you nevertheless decide to provide them, you must give your explicit consent. Without your consent, we will not be able to process your application.

4 Processing Methods:

Data will be processed with full respect for fundamental rights, confidentiality, and the dignity of the data subjects, in accordance with the principles of fairness, lawfulness, and transparency, and for purposes not exceeding those for which the data were collected.

Processing will be carried out using manual, electronic, and paper-based tools, and all necessary or appropriate security measures will be adopted to preserve data integrity, prevent loss (including accidental loss), and prevent unauthorized access.

5 Data retention:

Data processed to meet legal, accounting, or tax obligations will be retained for 10 years. Other data not subject to statutory obligations will be retained for 36 months from the date of collection and may be used for future employment or collaboration opportunities. At the end of this period, all data related to your Curriculum Vitae will be deleted.

6 Recipients of personal data:

Personal data will not be disclosed publicly but may be communicated to specific recipients.

Internal personnel, based on their roles and job functions, are authorized to process data within the limits of their duties and in accordance with the Controller's written instructions.

Data may also be communicated to entities legally entitled to access them under applicable laws and regulations.

Where a working relationship is established, the data may be shared with external consultants, appointed as Data Processors, for compliance with labor, accounting, tax, or administrative obligations.

7 Transfer of data Abroad

Personal data collected for the purposes outlined in this notice will not be transferred outside the European Union.

8 Provision of data:

Providing complete personal details and a valid e-mail address for administrative documentation is mandatory under applicable laws and regulations, and necessary for fulfilling potential contractual obligations.

Providing personal data relating to your professional qualifications and previous work experience is optional, but failure to provide such data will make it impossible for the Controller to evaluate your profile or consider you for potential opportunities.

9 Data subject rights:

Except in cases of legal obligations, public interest, or exercise of public authority, the data subject has the right to withdraw consent to data processing at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. Under Articles 15–22 of the GDPR, data subjects have the right to: obtain confirmation as to whether or not their personal data are being processed and to access such data; be informed of the purposes, categories of data, recipients, and storage periods; request rectification (Art. 16), erasure (Art. 17, “right to be forgotten”), restriction (Art. 18), or portability (Art. 20) of their data; object to processing on legitimate grounds; not be subject to automated decision-making, including profiling (Art. 22). The exercise of rights is free of charge and not subject to any particular formal requirements.

10 Exercising data subject rights and response times:

Data subjects may exercise their rights or request information on data processing through the following channels:

By contacting the Data Controller, Adelaide Hotel Srls, at +39 059 283600 or via e-mail at amministrazione@rechigiparkhotel.it

For formal requests, it is recommended to use the official request form provided by the Data Protection Authority and send it to certified e-mail: adelaidehotel@legalmail.it or postal address: Via Emilia Est 1581, 41122 Modena (MO), Italy

The Controller will respond as soon as possible, and in any case within 30 days of receiving the request, unless it is impossible or requires a disproportionate effort. Any delay or inability to comply will be duly justified.

11. Complaints and appeals:

If you believe that your rights have been violated, you may lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) following the procedures and instructions available on the website www.garanteprivacy.it, or file a judicial or administrative appeal.