

# PRIVACY MANUAL

Documentation drawn up in compliance with the provisions of the GDPR 2016/679 "General Data Protection Regulation" and current domestic legislation

**IMPERTEK SRL**

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## PERSONAL DATA PROCESSING POLICY PURSUANT TO AND FOR THE PURPOSES OF ART. 13 OF (EU) REGULATION 2016/679 ("GDPR")

Hereby this policy, IMPERTEK SRL provides Candidates (who define themselves as **Data Subjects** pursuant to the GDPR) with personal data processing policy concerning them.

### Who processes personal data

The Data Controller, i.e. the person who determines the purposes and means of the processing of personal data, is IMPERTEK SRL, with registered office in Via Po, 507 - 30022 Ceggia (VE), who can be contacted at the following addresses: +39 0421 322525 r.a., info@impertek.com

### Purpose and legal basis of processing

Personal data is processed for the following purposes and in compliance with the respective legal bases:

Purpose	Legal basis (Art. 6 GDPR)
Management of the research and selection of personnel, and in particular of the curriculum vitae, sent or delivered spontaneously, for the sole purpose of responding to the requests sent to us and for the purposes of the evaluation of the profile for the possible establishment of an employment or professional collaboration relationship.	Execution of a contract or pre-contractual measures.

Please note that the CV must not contain any special categories of data (so-called sensitive data) or data relating to criminal convictions and offences, unless such data is necessary for the establishment of the employment relationship in compliance with current employment legislation; with regard to data relating to the health of disabled workers, in compliance with Italian Law 68 of 12 March 1999, "Rules on the right to work of persons with disabilities", it is specified that no pathology should be indicated, but only that the requirements are met. Any different particular categories of data indicated will not be taken into consideration, nor in any case processed, for the evaluation of the profile.

### Nature of the provision of data

The provision of data is necessary for the fulfilment of legal and contractual obligations; therefore, any refusal to provide the same, in whole or in part, can result in the impossibility to proceed with the research and selection activities and possibly to execute the contract or to correctly carry out all the fulfilments related to the employment relationship.

### Disclosure of data

Without prejudice to compliance with current regulations, personal data may be communicated, exclusively for the pursuit of the purposes mentioned in this policy, to:

- Companies belonging to the same business group;
- Professionals and consultants, consultancy companies, companies operating in the field of personnel selection, Public Placement Entities, Public and Private Training Entities;
- In particular, subjects who carry out processing on behalf of the Data Controller as Data Processors in compliance with art. 28 GDPR, such as, by way of example: professionals and/or companies appointed to carry out consulting activities in the labour, technical-IT fields. The complete and up-to-date list of Data Processors can be consulted by entitled users upon request, at the Data Controller's registered office;
- Subjects authorised to access the data by current legislation and/or to which the data must be disclosed in order to fulfil legal obligations.

Personal data may be processed by employees and collaborators assigned to the competent offices of the Data Controller, explicitly authorised to process on the basis of art. 29 of the GDPR and current domestic legislation.

### Processing of data abroad

Personal data may be transferred abroad only for the pursuit of the purposes referred to herein, or for strictly technical reasons related to the structure of the Company Information System and/or the application of technical and organisational security measures deemed appropriate by the Data Controller, and exclusively in compliance with arts. 44 et seq. GDPR (in the presence of adequacy decisions and/or appropriate safeguards, provided that the data subjects have enforceable rights and effective remedies, or provided that one of the specific derogations envisaged by the legislation is applicable).

### Data retention period.

The data will be kept in our archives even after the job interview, for the fulfilment of all possible obligations related to this activity, and, in any case, for a period of time not exceeding the achievement of the purposes for which they are processed ("principle of limitation of storage" pursuant to art. 5 GDPR 2016/679).

Specifically, the data will be stored by the Data Controller for a period of 24 to 60 months, depending on the professional profile.

In relation to specific statutory limitation periods, data required for the ascertainment, exercise or defence of a legal right may be subject to longer retention periods.

The obsolescence of stored data in relation to the purposes for which it was collected is periodically checked.

### Rights of the data subject

The Data Subject shall have the right, in the cases envisaged, to obtain access and rectification or erasure of their personal data or the restriction of processing which concerns them, or to object to processing (arts. 15 et seq. of the GDPR), by contacting the Data Controller at the following email address: info@impertek.com.

### Right to complain

Data subjects who believe that the processing of their personal data takes place in breach of the provisions of the GDPR have the right to lodge a complaint with the Data Protection Authority, as envisaged by art. 77 of the GDPR, or taking legal action (art. 79 of the GDPR).

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Ceggia, 10/06/2025

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