
Subject: Information on the processing of personal data, pursuant to Article 13, EU Regulation No. 2016/679 - "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR") and Legislative Decree No. 196/2003, supplemented by Legislative Decree No. 101/2018.

With this information notice, we would like to inform you of the manner in which the companies L"ASTEMIA and TENUTE DEL VINO (hereinafter also collectively referred to as the Companies or Joint Owners) process your personal data, communicated by you through your Curriculum Vitae.

Where not specified, all articles of law cited in this document refer to the GDPR.

1) Data controller

Joint data controllers are the companies

- L"ASTEMIA S.R.L., with registered office in Via Crosia 40 in Barolo (CN - 12069) and VAT no.: 03203200047
- TENUTE DEL VINO S.R.L., with registered office in Via Alba, 26 in Barolo (CN - 12069) and VAT no.: 02929850044, who have signed a co-ownership agreement.

2) Appointment of DPO

Since the co-owners do not fall under the cases indicated in Art. 37 of the GDPR, nor under those indicated in the various interpretations of the Data Protection Authority, they did not consider it necessary to appoint a Data Protection Officer.

3) Subject of the processing

The subject of the processing is personal, identification and contact data (e.g. name, surname, educational qualification, address, telephone number, e-mail, school and work record, achievements, certificates and other information, even of a sensitive nature, which may appear on your Curriculum Vitae), hereinafter "personal data", communicated by you in connection with an application to the Controller.

4) Purpose of the processing, legal basis, nature of the provision.

The purpose of the processing of the data referred to in point 3 is to enable the inclusion of your name in the personnel selection flow implemented by the Joint Owners. For this specific purpose, the processing is lawful in accordance with Art. 6, para. 1, letter a) and requires your explicit consent, which is the sending of your CV itself. Providing the data is entirely voluntary, but the completeness of the data significantly affects the selection process.

If you wish your CV to be stored over time, this constitutes a new processing purpose, which must be authorised by you by means of an explicit statement at the foot of your CV. In the absence of such authorisation, your CV will be kept only for the period of time that the Joint Owners define for the evaluation and selection process, after which it will be deleted.

5) Processing method, processing duration

Your data is collected from your person, using common means of communication, in the process of personnel selection, and is recorded in both paper and electronic archives, under the responsibility of the Human Resources Department. This data is updated over time according to the information that the Joint Owners receive.

The processing of your data is carried out by means of the operations indicated in Art. 4 no. 2) GDPR, namely: collection, registration, organisation, storage, consultation, use, blocking, communication, deletion and destruction. Your data is processed on paper as well as electronically.

Unless you indicate otherwise, your data is only processed for the period dedicated to the evaluation and selection process, after which it is deleted. With your explicit consent, however, it remains in the company archives, stored for a period of 3 years after receipt. Beyond this period, it is deleted, as it is considered obsolete. If, on the other hand, you have joined the company in the meantime, your CV will become part of your employee file, and will follow the corresponding process.

6) Data Access

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Joint Owners, authorised to process and/or system administrators, or to third party companies or other parties authorised by the Data Controller, in their capacity as external data processors. These processors undertake to implement all appropriate security systems to protect your data, and adhere to a protocol of security procedures and policies that the Controller has produced and constantly updates.

7) Data Communication

Without the need for express consent (ex art. 6 lett. b), c) of the GDPR), the Joint Owners may communicate your data to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom communication is compulsory by law for the fulfilment of the aforementioned purposes. These subjects will process the data in their capacity as autonomous data controllers. Your data will not be disclosed.

8) Data transfer to non-EU countries

The data provided under point 3) is stored electronically on dedicated company servers, provided by external data controllers, or in Cloud platforms adopted by the Joint Owners.

It is in any case understood that the Data Controller, should it become necessary, shall have the right to move the servers also outside the EU, for example in the case of use of Cloud services. In this case, the Data Controller assures you as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

9) Rights of the data subject

As a data subject, you enjoy the rights set out in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right to correct
- Right to erasure ("right to be forgotten")
- Right to restriction of processing
- Right to Obligation to notify in case of correction or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making concerning natural persons, including profiling

10) Procedures for exercising the rights of the data subject

You may exercise your rights at any time by sending:

- a registered letter with acknowledgement of receipt addressed to the Data Controller, referred to in point 1)
- an e-mail to privacy@astemiapentita.it

L"ASTEMIA S.R.L.
TENUTE DEL VINO S.R.L.
Barolo (CN)