



## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

### How to read this notice

RGI Group is committed to protecting Your personal data. This notice provides You, in accordance with Regulation (EU) 2016/679 (GDPR) and applicable laws, with information on the processing of Your personal data collected as part of the recruitment process.

To ensure maximum transparency and to provide You with precise and relevant information, which also takes into account local regulations, this document is structured in separate sections, one for each country where You may submit Your application. Each section constitutes a complete and self-contained privacy notice.

### How to consult the notice

Please identify and consult only the section relevant to Your application, based on the country of the company to which you have applied. This will allow You to directly access the information concerning You in a clear and simple manner.

For your convenience, below you will find the sections to consult:

- Application for positions in Italy: Please refer to **Section 1 – Italy**;
- Application for positions in France: Please refer to **Section 2 – France**;
- Application for positions in Germany: Please refer to **Section 3 – Germany**;
- Application for positions in Tunisia: Please refer to **Section 4 – Tunisia**.

Reading the specific section for the country of Your interest will provide You with a complete overview of the processing of Your data, including the purposes, legal bases, retention periods, and Your rights.

## SECTION 1 – ITALY

### INFORMATIVA PRIVACY PER I CANDIDATI, AI SENSI DELL'ART. 13 DEL GDPR

Siamo entusiasti del tuo interesse nei nostri confronti e siamo lieti di accompagnarti in questo iter selettivo necessario per entrare a far parte del nostro Team!

È bene che tu sappia che RGI S.p.A., al fine di selezionare figure professionali da inserire in organico, offre la possibilità di rispondere agli annunci di ricerca del personale pubblicati nella sezione “lavora con noi” del proprio sito web, o in altri siti, nonché di inserire sul sito medesimo la propria candidatura spontanea. A tal fine, RGI S.p.A. richiede al candidato di fornire ogni dato utile a valutare la rispondenza del profilo professionale a ricoprire posizioni lavorative all'interno della Società.

Nel rispetto delle norme sulla protezione dei dati personali (e Regolamento UE, n. 2016/679), RGI S.p.A. ti invita a leggere la seguente informativa, che è stata pensata e scritta con linguaggio semplice e conciso per poterti aiutare a comprendere chiaramente come trattiamo i tuoi dati personali.

#### **La nostra informativa sulla Privacy:**

##### **1. Titolare del Trattamento**

I dati personali da te forniti verranno trattati da RGI S.p.A., in qualità di Titolare del trattamento dei dati, con sede legale in Via S. Gregorio, 34, 20124 Milano (MI), su supporto cartaceo o informatico.

##### **2. Dati trattati, modalità e natura del trattamento**

Il conferimento dei dati personali risulta necessario per poter partecipare al processo di selezione e l'eventuale rifiuto comporterà l'impossibilità da parte di RGI S.p.A. di poter valutare la tua candidatura.

Indichiamo a titolo esemplificativo ma non esaustivo i dati comuni oggetto di trattamento:

- Dati identificativi e di contatto (quali nome, cognome, indirizzo di residenza e di domicilio, luogo e data di nascita, e-mail, numero di telefono, codice fiscale)
- Dati contenuti nel CV, dati di richiesta inquadramento e di richiesta di retribuzione, nonché dati relativi all'educazione e alle esperienze professionali
- Eventuali dati valutativi (notazioni, valutazioni, ecc. eventualmente raccolti in occasione dei colloqui e/o forniti da soggetti terzi)

### 2.1 Dati particolari

Nell'ambito del tuo curriculum vitae, potranno essere presenti anche dati di natura particolare come individuati all'art. 9 del GDPR (tali da intendersi, ai sensi del GDPR, i dati idonei a rivelare l'origine razziale ed etnica, le opinioni politiche, le convinzioni religiose o filosofiche, nonché l'appartenenza sindacale i dati personali idonei a rivelare lo stato di salute, la vita sessuale o l'orientamento sessuale), fornitici per un miglior inquadramento della tua posizione (e.g. nell'ambito di specifiche selezioni, dati relativi all'appartenenza a categorie protette). Il trattamento di tali dati personali sarà pertanto effettuato, nel pieno rispetto di quanto previsto dall'art. 9, paragrafo 2, lett. b) e lett. h) del GDPR (*i.e.* il trattamento è necessario per assolvere gli obblighi ed esercitare i diritti specifici del titolare del trattamento o dell'interessato in materia di diritto del lavoro e della sicurezza sociale e protezione sociale ovvero – come nel caso di selezioni relative alle categorie protette - il trattamento è necessario per finalità di medicina preventiva o di medicina del lavoro). I dati particolari saranno trattati nel rispetto della normativa di cui agli artt. 5, 6 e 9 GDPR.

Nell'ipotesi in cui dovessero essere fornite informazioni non pertinenti alle finalità indicate all'interno del presente documento, RGI S.p.A. provvederà a segnalarlo e a cancellare immediatamente tali informazioni.

### 3. Basi giuridiche e finalità del trattamento

I tuoi dati sono necessari per capire se il tuo profilo professionale corrisponde a quello che cerchiamo e per formulare una eventuale proposta di inserimento in azienda.

I dati personali forniti verranno trattati, direttamente e/o tramite terzi, al fine di: gestire il corretto svolgimento del processo di selezione del personale, anche alla luce delle candidature ricevute da soggetti terzi che supportano il Titolare nella individuazione dei candidati (di seguito Head Hunters). Base giuridica: precontrattuale/contrattuale e perseguimento del legittimo interesse del titolare. I dati potranno essere valutati anche per altri job post per i quali risultino idonei con quello specifico job post. Base giuridica: consenso dell'interessato.

I dati che chiediamo di fornire tramite inserimento del curriculum vitae nella sezione "Lavora con noi" tramite le apposite sezioni in risposta ad un nostro annuncio e tramite l'iter di selezione nel suo complesso, anche attraverso la somministrazione diretta o tramite società all'uopo incaricate, di questionari o test tecnici (ad esempio di programmazione e di lingua straniera) rilevanti ai fini della valutazione delle competenze professionali nel rispetto della normativa vigente, vengono raccolti, attraverso la piattaforma informatica di gestione delle candidature allo scopo di verificare se la figura professionale del candidato sia in linea con le esigenze della società e, pertanto, per selezionare personale da inserire nel nostro organico.

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RGI S.p.A. si riserva di rimuovere dal proprio archivio i dati ricevuti, ove questi, ad un controllo effettuato, risultino inesatti, incompleti o non aggiornati.

### 4. Modalità di trattamento dei dati

I dati personali da te forniti su supporto cartaceo o informatico verranno trattati da RGI S.p.A. con attenzione e rispetto. RGI S.p.A. curerà:

1. La raccolta e l'esatta registrazione, in modo che essi corrispondano a quanto da te dichiarato;
2. l'organizzazione e la strutturazione degli stessi al fine di gestire l'iter di selezione;
3. l'adattamento o la modifica, l'estrazione, la consultazione, l'uso, la comunicazione mediante trasmissione, diffusione o qualsiasi altra forma di messa a disposizione, il raffronto o l'interconnessione, la limitazione, la conservazione in una forma che consenta la tua identificazione per un periodo di tempo non superiore a quello necessario alle finalità per cui essi sono stati raccolti, come meglio specificato all'art. 7;
4. la cancellazione o l'anonimizzazione alla scadenza del periodo indicato all'art. 7.

### 5. Ambito di circolazione dei dati

I tuoi dati verranno trattati dal minor numero possibile di persone, appositamente autorizzate da RGI S.p.A. per il perseguimento delle finalità descritte al precedente paragrafo 3; i tuoi dati possono essere utilizzati da personale di RGI S.p.A. cui è stato assegnato uno specifico ruolo nel processo di selezione ed a cui sono state impartite adeguate istruzioni relative alla riservatezza.

#### 5.1 Accesso

I tuoi dati personali saranno resi accessibili solo a coloro i quali, all'interno della società, ne abbiano necessità a causa della propria mansione o posizione gerarchica (responsabile della selezione, manager di riferimento durante l'iter di selezione, HR Team per gli adempimenti precontrattuali). Tali soggetti, saranno opportunamente istruiti al fine di evitare perdite, distruzione, accessi non autorizzati o trattamenti non consentiti dei dati stessi.

I tuoi dati personali saranno anche resi accessibili a soggetti terzi che svolgono attività strumentali per conto del Titolare e che tratteranno i dati come responsabili del trattamento quali:

- Società di servizi (anche informatici) a cui siano affidate specifiche gestioni

(gestione di sistemi informatici, attività di data entry, ecc.);

- Società del medesimo gruppo cui il Titolare appartiene per questioni amministrativo-organizzative

### 5.2 Comunicazione

I dati personali potranno essere comunicati, senza il tuo preventivo consenso, per le finalità di cui sopra a Pubbliche Amministrazioni, Ministero delle finanze, Agenzia delle Entrate, enti ministeriali e Autorità competenti, enti locali (regioni, province, comuni), Commissioni Tributarie provinciali e regionali, casse di previdenza e assistenza, ASL, Associazioni e Rappresentanze sindacali, Università/Enti Promotori convenzionati per il tirocinio e Istituti di Credito, società di selezione e/o agenzie per il lavoro, liberi professionisti, etc. che tratteranno, su loro richiesta, i dati in qualità di titolari autonomi del trattamento.

### 6. Trasferimento dei dati personali

Il Titolare può trasferire i Dati al di fuori dell'Unione Europea. A tal fine, ai sensi della normativa privacy, il Titolare valuta l'impatto dei trasferimenti di dati e adotta, se applicabili, le garanzie più appropriate (ad esempio, le decisioni di adeguatezza o le clausole contrattuali standard).

### 7. Conservazione dei dati

I tuoi dati verranno conservati per il tempo che riteniamo necessario per la tua selezione. I dati personali che ci avrai fornito saranno conservati per il periodo necessario ad effettuare le valutazioni in merito alle esigenze di assunzione di personale e comunque per non oltre 24 mesi dalla data di ricezione, anche per i dati ricevuti per il tramite degli Head Hunters. Al decorrere del termine previsto, in assenza di ulteriore consenso, i dati saranno cancellati o anonimizzati.

### 8. Diritti dell'interessato

Quale interessato, Ti è riconosciuto l'esercizio del diritto di chiedere al titolare del trattamento l'accesso ai dati personali e la rettifica e, nei casi previsti dalla legge, la cancellazione o la limitazione o il diritto alla portabilità dei dati o di opporsi al loro trattamento. L'interessato ha sempre il diritto di proporre reclamo all'Autorità di Controllo. Per l'esercizio dei propri diritti è possibile inviare una richiesta al DPO, contattabile al seguente indirizzo e-mail: [dpo@rgigroup.com](mailto:dpo@rgigroup.com).

## **9. Nomina del Responsabile della Protezione dei Dati**

Ti informiamo di aver provveduto alla nomina del Responsabile della Protezione dei Dati i cui dati di contatto sono disponibili sul sito [www.rgigroup.com](http://www.rgigroup.com) e contattabile al seguente indirizzo e-mail: [dpo@rgigroup.com](mailto:dpo@rgigroup.com)

Milano, 29 gennaio 2024

Il Titolare  
RGI S.p.A.

## SECTION 2 - FRANCE

### PRIVACY POLICY FOR CANDIDATES, PURSUANT TO ART. 13 OF THE GDPR

We are thrilled that you are interested in us and are happy to accompany you through the selection process necessary to join our team!

It is good for you to know that KAPIA RGI (hereinafter as “RGI”, the “Company” or “we”), in order to select professional figures to be included in its staff, offers the possibility to reply to the personnel research announcements published in the section “Working at RGI” of its web site, or in other sites, as well as to insert on the same site your own spontaneous application. To this end, RGI requests the candidate to provide any information that may be useful in order to assess the suitability of the professional profile to fill positions within the Company.

In compliance with the rules on the protection of personal data (and EU Regulation no. 2016/679), RGI invites you to read the following information, which has been designed and written in simple and concise language to help you clearly understand how we process your personal data.

#### Our Privacy Policy:

##### 5. Data Controller

The personal data you provide will be processed by KAPIA RGI, in its capacity as Data Controller, with registered office in **Paris, 29 r Lisbonne, 75008 Paris**.

##### 6. Data processed, methods and nature of processing

The provision of personal data is necessary in order to be able to take part in the selection process and any refusal will make it impossible for RGI to evaluate your application.

We indicate by way of example but not limited to the common data subject to processing:

- Identification and contact data (such as name, surname, residential and home address, place and date of birth, e-mail, telephone number)
- CV and salary application data, as well as data on education and professional experience
- Any evaluative data (notations, assessments, etc. that may have been collected during interviews and/or provided by third parties)

##### 2.1 Particular data

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As part of your CV, we may also collect data of a special nature as identified as “sensitive” in Art. 9 of the GDPR (i.e. personal data relating to health and disability status), provided to us for the purpose of better filling your position (e.g. in the context of specific selections, data relating to membership of protected categories). The processing of such personal data will therefore be carried out in full compliance with the provisions of Article 9(2)(b) and (h) of the GDPR (i.e. the processing is necessary to fulfil the obligations and exercise the specific rights of the data controller or of the data subject in the field of labour law and social security and social protection or - as in the case of selections relating to protected categories - the processing is necessary for the purposes of preventive medicine or occupational medicine). Such special data will be processed in compliance with the regulations set out in Articles 5, 6 and 9 GDPR.

In the event that any information is provided that is not pertinent to the purposes indicated in this document, RGI. will notify you and delete such information immediately.

### 7. Legal basis and purpose of processing

Your data are needed to understand whether your professional profile corresponds to what we are looking for and to formulate a possible job offer.

The personal data provided will be processed, directly and/or through third parties, in order to:

- manage the proper performance of the personnel selection process, also in the light of applications received from third parties who support the Data Controller in identifying candidates (hereinafter Head Hunters).

*Legal basis: pre-contractual/contractual and pursuit of the legitimate interest of RGI.*

- suggest other job posts for which they are suitable with that specific job post.

*Legal basis: your consent.*

The data that we ask you to provide through the insertion of your curriculum vitae in the “Working at RGI” section in response to one of our advertisements and through the selection process as a whole, including through the direct administration or through companies appointed for this purpose of questionnaires or technical tests (e.g. programming and foreign language tests) relevant to the assessment of professional skills in compliance with the regulations in force, are collected through the computer platform for managing applications in order to verify whether the candidate's professional profile is in line with the company's needs and, therefore, to select personnel to be included in our workforce.

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RGI reserves the right to remove the data received from its archives if, upon inspection, they prove to be inaccurate, incomplete or out of date.

### 8. Modalities of data processing

The personal data you provide on paper or computer will be treated by RGI with care and respect. RGI will take care of:

5. the collection and exact registration, so that they correspond to what you declared;
6. the organisation and structuring of them in order to manage the selection process;
7. the adaptation or modification, extraction, consultation, use, communication by means of transmission, diffusion or any other form of making available, comparison or interconnection, restriction, storage in a form which permits your identification for a period of time not exceeding that necessary for the purposes for which they were collected, as better specified in Article 7;
8. cancellation or anonymisation upon expiry of the period indicated in Article 7.

### 5. Scope of data circulation

Your data will be processed by the smallest possible number of persons, specifically authorised by RGI for the pursuit of the purposes described in paragraph 3 above; your data may be used by RGI personnel who have been assigned a specific role in the selection process and who have been given appropriate instructions regarding confidentiality.

#### 5.1 Access

Your personal data will only be made accessible to those within the Company who need it due to their job or hierarchical position (selection manager, reference manager during the selection process, HR Team for pre-contractual fulfilments). Such persons shall be duly instructed in order to avoid loss, destruction, unauthorised access or unauthorised processing of the data.

Your personal data will also be made accessible to third parties who perform instrumental activities on behalf of the Controller and who will process the data as data processors such as:

- Service companies (including IT companies) entrusted with specific management tasks (management of computer systems, data entry activities, etc.);
- Companies of the same group to which the owner belongs for administrative-organisational matters

## 5.2 Communication

Your personal data may be communicated, without your prior consent, for the above purposes to public administrations, ministerial bodies and competent authorities, local bodies (regions, provinces, municipalities), welfare and assistance funds, Trade Union Associations and Representatives, Universities/Student Boards affiliated with the traineeship and Credit Institutions, recruitment companies and/or employment agencies, freelance professionals, etc. who will process, at their request, the data as autonomous data controllers.

## 6. Transfer of personal data

RGI may transfer your data outside the European Union. To this end, in accordance with privacy regulations, we assess the impact of data transfers with regard to the data protection legislation of the country of destination (i.e. adequacy decisions) and adopts, if applicable, the most appropriate safeguards (e.g. standard contractual clauses).

## 10. Data Retention

Your data will be kept for as long as we deem necessary for your selection. The personal data you provide us with will be kept for the period necessary to carry out the assessments regarding your recruitment needs and will be deleted:

- if not selected: three months after the recruitment process has been completed, up to two years if you consent to it.
- if selected: up to five years from the date of the decision to hire.

## 11. Rights of the data subject

You may request to :

- access to your personal information,
- rectify the personal information we hold about you if it is inaccurate or incomplete,
- erase your personal information where we have no reason to continue processing it,
- object to the processing of your personal information and if there is anything about your particular circumstances that makes you wish to object to the processing on that ground, to request restriction of the processing of your personal information, or
- request the transfer of your personal information to another party.

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You have the right to withdraw your consent to the processing of your personal data at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally consented to, unless we have another legitimate basis to do so in law or to enable us to honour the employment relationship.

You always has the right to lodge a complaint with the Supervisory Authority (i.e., the CNIL in France).

To exercise your rights, you may send a request to the DPO, who can be contacted at the following e-mail address: [dpo@rgigroup.com](mailto:dpo@rgigroup.com).

### 12. Appointment of the Data Protection Officer

We inform you that we have appointed a Data Protection Officer whose contact details are available at [www.rgigroup.com](http://www.rgigroup.com) and who can be contacted at the following e-mail address: [dpo@rgigroup.com](mailto:dpo@rgigroup.com)

France, **October** 2024

KAPIA RGI  
Data Controller

## SECTION 3 - GERMANY

### DATENSCHUTZERKLÄRUNG FÜR BEWERBERINNEN UND BEWERBER

Wir freuen uns, dass Sie sich für unser Unternehmen interessieren und begleiten Sie gerne durch den Bewerbungs- und Auswahlprozess, der zur Aufnahme in unser Team erforderlich ist.

Es ist gut zu wissen, dass die Novum-RGI Bewerberinnen bzw. Bewerber für ihre Auswahl von Fachleuten und qualifizierten Personen die Möglichkeit bietet, auf die auf unserer Webseite und/oder auf anderen Webseiten veröffentlichten Stellenausschreibungen zu antworten sowie auf denselben Webseiten Initiativbewerbungen einzureichen. Zu diesem Zweck bittet Novum-RGI die Bewerberinnen bzw. Bewerber, alle Informationen bereitzustellen, die sachdienlich sind, um die Eignung ihres Berufsprofils für die Besetzung von Stellen in unserem Unternehmen zu beurteilen.

In Übereinstimmung mit den gesetzlichen Vorschriften zum Schutz personenbezogener Daten – insbesondere der EU-Datenschutzgrundverordnung (DSGVO) und des Bundesdatenschutzgesetzes (BDSG) – bitten wir Sie, die folgenden Informationen sorgfältig zu lesen, damit Sie verstehen, wie wir Ihre personenbezogenen Daten im Rahmen eines Bewerbungsverfahrens verarbeiten.

#### 1. Verantwortlicher für die Datenverarbeitung und Datenschutzbeauftragter

Ihr Ansprechpartner als für die Datenverarbeitung Verantwortlicher im Sinne von Art. 4 Nr. 7 DSGVO sowie anderer nationaler Datenschutzgesetze der EU-Mitgliedstaaten (insbesondere das BDSG) und sonstiger datenschutzrechtlicher Bestimmungen ist die Novum-RGI Germany GmbH, Nordostpark 51, 90411 Nürnberg, (nachfolgend „**Novum-RGI**“ oder „**wir**“, „**unser**“, „**uns**“ etc.).

Unseren Datenschutzbeauftragten erreichen Sie unter Novum-RGI Germany GmbH, [dpo@rgigroup.com](mailto:dpo@rgigroup.com).

#### 2. Verarbeitete personenbezogene Daten und Freiwilligkeit

Im Rahmen des Bewerbungsverfahrens benötigen wir Ihre Angabe von personenbezogenen Daten, um an unserem Bewerbungs- und Auswahlverfahren teilnehmen zu können. Hierzu zählen insbesondere Identifikations- und Kontaktdaten (z.B. Name, Adresse, Geburtsort und -datum, Telefon, und E-Mail), alle mit Ihrer Bewerbung in Verbindung stehenden Daten (z.B. Lebenslauf, Gehaltsvorstellungen, Zeugnisse und andere Ausbildungsdaten, Qualifikationen und Berufserfahrungen sowie ggf. Lichtbild), Daten aus beruflichen Netzwerken (z.B. LinkedIn) sowie ggf. Ihre Bankverbindung (für die Erstattung von Reisekosten). Die Bereitstellung dieser Angaben ist freiwillig. Wir möchten Sie allerdings darauf hinweisen, dass die Nichtbereitstellung derartiger Angaben dazu führen kann, dass wir möglicherweise außerstande

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sind, Ihre Bewerbung zu prüfen und zu bewerten. Im Falle einer Bewerbung erheben und verarbeiten wir ferner etwaige Bewertungsdaten im Zusammenhang mit Ihrer Bewerbung (z.B. Notizen und Bewertungen, die wir während eines Bewerbungsinterviews sammeln und/oder von Dritten zur Verfügung gestellt bekommen).

### 3. Zwecke und Rechtsgrundlagen der Datenverarbeitung

Wir verarbeiten Ihre personenbezogenen Daten zum Zwecke der Durchführung des Bewerbungsverfahrens bzw. der Prüfung und Bewertung, ob wir Ihnen die Stelle, auf die Sie sich beworben haben, anbieten und Sie bei uns einstellen können. Rechtsgrundlage der Datenverarbeitung ist Art. 88 Abs. 1 DSGVO in Verbindung mit § 26 Abs. 1 S. 1 BDSG bzw. Art. 6 Abs. 1 lit. b DSGVO. Soweit es sich bei den personenbezogenen Daten um besondere Kategorien personenbezogener Daten im Sinne von Art. 9 DSGVO handelt (z.B. Religionszugehörigkeit, Gewerkschaftszugehörigkeit oder Gesundheit), die Sie selbst freiwillig mitteilen (z.B. Information über eine Schwerbehinderteneigenschaft), erfolgt die Datenverarbeitung auf der Rechtsgrundlage von Art. 9 Abs. 2 lit. b DSGVO in Verbindung mit § 26 Abs. 3 BDSG.

Sofern Sie einen Arbeitsvertrag unterzeichnen, speichern wir Ihre personenbezogenen Daten im Folgenden zur Durchführung des Beschäftigungsverhältnisses. Rechtsgrundlage der Datenverarbeitung ist Art. 88 Abs. 1 DSGVO in Verbindung mit § 26 Abs. 1 S. 1 BDSG bzw. Art. 6 Abs. 1 lit. b DSGVO.

Sofern Sie dies ausdrücklich wünschen, speichern wir Ihre personenbezogenen Daten auch beim Nichtzustandekommen eines Arbeitsvertrages zum Zwecke Ihrer Berücksichtigung bei künftigen Stellenausschreibungen. Rechtsgrundlage der Datenverarbeitung ist in diesem Fall Ihre erteilte Einwilligung gemäß Art. 6 Abs. 1 lit. a DSGVO.

### 4. Methoden der Datenverarbeitung

Die Datenverarbeitung erfolgt im Einklang mit den Grundsätzen der DSGVO, die u.a. vorsehen, dass personenbezogene Daten

- rechtmäßig, nach Treu und Glauben und auf transparente Weise verarbeitet werden;
- für festgelegte, eindeutige und rechtmäßige Zwecke erhoben werden;
- sachlich richtig sind und (soweit erforderlich) auf dem neuesten Stand gehalten werden;
- angemessen und sachdienlich sind und sich auf das beschränken, was für die Zwecke, für die sie verarbeitet werden, erforderlich ist.

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Die Verarbeitung personenbezogener Daten erfolgt durch uns mithilfe von elektronischen Mitteln oder auf Papier und Verfahren, die geeignet sind, Sicherheit und Vertraulichkeit zu gewährleisten.

### 5. Umfang der Datenverarbeitung und -weitergabe

Wir werden Ihre personenbezogenen Daten nicht an Dritte weitergeben, es sei denn, dies ist für die Bearbeitung und Abwicklung Ihrer Bewerbung erforderlich (Art. 88 Abs. 1 DSGVO in Verbindung mit § 26 Abs. 1 S. 1 BDSG bzw. Art. 6 Abs. 1 lit. b DSGVO), Sie haben in die Weitergabe eingewilligt (Art. 6 Abs. 1 lit. a DSGVO) oder die Weitergabe ist aufgrund einschlägiger gesetzlicher Bestimmungen zulässig.

Ihre Daten werden von der kleinstmöglichen Anzahl von Personen verarbeitet, die von der Novum-RGI speziell für die Durchführung der unter Ziffer 3 beschriebenen Zwecke ermächtigt wurden. Ihre personenbezogenen Daten können von Mitarbeitern der Novum-RGI verarbeitet werden, die mit einer speziellen Aufgabe im Auswahl- und Bewertungsverfahren betraut wurden und die entsprechenden Vertraulichkeitsverpflichtungen unterliegen.

Ihre personenbezogenen Daten werden nur denjenigen Personen innerhalb von Novum-RGI zugänglich gemacht, die diese zur Erfüllung ihrer Funktion oder hierarchischen Stellung im Rahmen der Bearbeitung Ihrer Bewerbung benötigen (z.B. Auswahlleiter, Referenzmanager während des Auswahlverfahrens und HR-Team). Ihre personenbezogenen Daten werden ferner auch Dritten zugänglich gemacht, die in unserem Auftrag Hilfstätigkeiten ausführen und die personenbezogenen Daten als Auftragsverarbeiter (Art. 4 Nr. 8 DSGVO) verarbeiten. Dies sind insbesondere externe Dienstleistungsunternehmen (einschließlich IT-Unternehmen), die mit spezifischen Verwaltungsaufgaben betraut sind (z.B. Verwaltung von Computersystemen und der Dateneingabe) sowie verbundene Unternehmen von Novum-RGI im Sinne der §§ 15 ff. AktG für verwaltungsorganisatorische Angelegenheiten.

### 6. Datenübermittlung in andere Länder

Ihre personenbezogenen Daten werden grundsätzlich innerhalb der Europäischen Union (EU) bzw. in den Vertragsstaaten des Europäischen Wirtschaftsraums (EWR) verarbeitet. Für den Fall, dass wir personenbezogene Daten an einen in einem Drittland ohne Angemessenheitsbeschluss der Europäischen Kommission gemäß Art. 45 DSGVO ansässigen Empfänger übermitteln, stellen wir den Schutz der personenbezogenen Daten mittels geeigneter Garantien gemäß Art. 46 DSGVO sicher, wie z.B. den Abschluss von Standarddatenschutzklauseln. Weitere Informationen, insbesondere welche geeigneten oder angemessenen Garantien wir im konkreten Einzelfall bei der Übermittlung der personenbezogenen Daten in Drittländer ergriffen haben, können Sie bei uns oder unserem Datenschutzbeauftragten über die unter Ziffer 1 genannten Kontaktmöglichkeiten anfordern.

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

Soweit wir für die Bereitstellung unserer IT-Infrastruktur externe Dienstleister einsetzen und diese möglicherweise Zugriff auf bei uns gespeicherte personenbezogene Daten erhalten können, stellen wir die Sicherheit der Datenverarbeitung u.a. durch Abschluss geeigneter Auftragsverarbeitungsverträge (Art. 28 DSGVO) sowie angemessener Maßnahmen im Sinne der Art. 44 ff. DSGVO sicher.

### 13. Aufbewahrung von Daten

Ihre personenbezogenen Daten werden von uns nur solange gespeichert, wie dies für die Erreichung der Zwecke, für die diese Daten erhoben wurden, erforderlich ist oder – soweit darüberhinausgehende gesetzliche Aufbewahrungsfristen bestehen – z.B. im Handelsgesetzbuch (HGB) und in der Abgabenordnung (AO) – für die Dauer der gesetzlich vorgegebenen Aufbewahrung. Im Anschluss werden Ihre personenbezogenen Daten von uns gelöscht. Lediglich in wenigen Ausnahmefällen werden Ihre Daten auch darüber hinaus gespeichert, z.B. wenn die Speicherung im Zusammenhang mit der Durchsetzung und Abwehr von Rechtsansprüchen erforderlich ist.

Sofern keine Einstellung erfolgt, erfolgt eine Löschung der Daten demnach regelmäßig spätestens sechs (6) Monate nach Abschluss des Bewerbungsverfahrens. In Einzelfällen kann es zu einer längeren Speicherung von einzelnen Daten kommen. Z.B. richtet sich die Dauer der Speicherung im Fall einer Reisekostenabrechnung nach den gesetzlichen Aufbewahrungspflichten aus dem HGB oder der AO, d.h. sechs (6) bzw. zehn (10) Jahre. Falls wir aufgrund Ihrer ausdrücklichen Einwilligung Ihre Bewerbung für die Berücksichtigung bei künftigen Stellenbesetzungen weiter aufbewahren dürfen, erfolgt eine Speicherung für die vereinbarte Aufbewahrungsdauer.

Sofern Sie einen Arbeitsvertrag unterzeichnen, speichern wir Ihre personenbezogenen Daten wie in unserer Datenschutzerklärung für Mitarbeiter beschrieben.

### 14. Keine automatisierte Entscheidungsfindung (einschließlich Profiling)

Die von Ihnen erhobenen personenbezogenen Daten werden nicht für ein Verfahren der automatisierten Entscheidungsfindung, einschließlich Profiling (Art. 22 DSGVO), verwendet.

### 15. Ihre Datenschutzrechte

Nach Maßgabe des geltenden Datenschutzrechts stehen Ihnen insbesondere die nachfolgenden Datenschutzrechte zu:

- **Recht auf Auskunft (Art. 15 DSGVO):** Sie haben das Recht, jederzeit Auskunft über Ihre von uns gespeicherten personenbezogenen Daten zu verlangen.

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

- **Recht auf Berichtigung (Art. 16 DSGVO):** Wenn wir Ihre personenbezogenen Daten verarbeiten, bemühen wir uns durch angemessene Maßnahmen sicherzustellen, dass Ihre personenbezogenen Daten für die Zwecke, für die sie erfasst wurden, richtig und aktuell sind. Für den Fall, dass Ihre personenbezogenen Daten unrichtig oder unvollständig sind, können Sie die Berichtigung dieser Daten verlangen.
- **Recht auf Löschung und Einschränkung (Art. 17 und 18 DSGVO):** Sie haben ggf. das Recht, die Löschung bzw. Einschränkung der Verarbeitung Ihrer personenbezogenen Daten zu verlangen, wenn z. B. für eine solche Verarbeitung gemäß dieser Datenschutzerklärung oder geltendem Recht kein legitimer Geschäftszweck mehr besteht und gesetzliche Aufbewahrungspflichten einer weiteren Speicherung nicht entgegenstehen.
- **Recht auf Datenübertragbarkeit (Art. 20 DSGVO):** Sie haben ggf. das Recht, die Sie betreffenden personenbezogenen Daten, die Sie uns bereitgestellt haben, in einem strukturierten, gängigen und maschinenlesbaren Format zu erhalten oder diese Daten einem anderen Verantwortlichen zu übermitteln.
- **Recht auf Widerspruch (Art. 21 DSGVO):** Sie haben ggf. das Recht, aus Gründen, die sich aus Ihrer besonderen Situation ergeben, Widerspruch gegen die Verarbeitung Ihrer personenbezogenen Daten einzulegen. Ferner haben Sie jederzeit das Recht, auch ohne Angabe von Gründen der Verarbeitung Ihrer personenbezogenen Daten für die Zwecke der Direktwerbung zu widersprechen.
- **Recht zum Widerruf Ihrer erteilten Einwilligung (Art. 7 Abs. 3 DSGVO):** Sofern Sie in die Erhebung und Verarbeitung Ihrer personenbezogenen Daten eingewilligt haben, können Sie Ihre Einwilligung jederzeit mit Wirkung für die Zukunft widerrufen, jedoch ohne dass die Rechtmäßigkeit der aufgrund der Einwilligung bis zum Widerruf erfolgten Verarbeitung dadurch berührt wird.

Zudem haben Sie das Recht, Beschwerde bei der Aufsichtsbehörde gemäß Art. 77 DSGVO einzulegen. Die für uns zuständige Datenschutzaufsichtsbehörde, das Bayerische Landesamt für Datenschutzaufsicht erreichen Sie per E-Mail an [poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de) oder unter folgenden Kontaktdaten: Promenade 18, 91522 Ansbach, Telefon +49 (0) 981 180093-0, Telefax +49 (0) 981 180093-800. Sie können sich aber auch an eine andere Datenschutzaufsichtsbehörde – etwa an Ihrem Wohnsitz – wenden.

Stand: November 2024

## SECTION 4 - TUNISIA

### PRIVACY POLICY FOR CANDIDATES, PURSUANT TO IN ACCORDANCE WITH ORGANIC LAW NO. 2004-63 OF 27 JULY 2004 ON THE PROTECTION OF PERSONAL DATA

We are excited about your interest in us and look forward to leading you through this recruiting process necessary to join our Team!

It is good for you to know that RGI Tunisia (“**RGI**”), in order to select professional figures to be included in its workforce, offers the possibility to respond to the personnel search ads published in the " Working at RGI " section of its website, or in other sites, as well as to post on the same site one's own spontaneous application. To this end, RGI Tunisia requests the candidate to provide any data useful for assessing the suitability of the professional profile to fill positions within the Company.

In compliance with the Organic Law no. 2004-63 of 27 July 2004 on the protection of personal data, RGI invites you to read the following policy, which is designed and written in simple and concise language to help you clearly understand how we process your personal data.

#### **Our Privacy Policy:**

##### **1. Data Controller**

The personal data you provide will be processed by RGI Tunis s. a. , as the Data Controller, with registered office in Résidence « Sana Business Center » Pavillon B, 2ème Etage- Boulevard Beji Caied Es-sebsi Centre Urbain Nord 1082 – Tunis, on paper or computer.

##### **2. Data processed, methods and nature of processing**

Providing personal information is necessary in order to participate in the selection process and refusal will result in RGI being unable to evaluate your application.

We indicate the data subject to processing:

- Identifying and contact information (such as first name, last name, residential and home address, place and date of birth, e-mail, telephone number, social security number)
- Data contained in the CV, job classification and salary request data, and education and work experience data

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

- Any evaluative data (notations, evaluations, etc. that may have been collected during interviews and/or provided by third parties)

### 2.1 Special data (so-called sensitive data)

As part of your resume, there may also be data of a special nature as identified in Article 14 of Organic Law No.63 of 2004, dated July 27,2004 concerning the protection of personal data (such to be understood, as data capable of revealing racial and ethnic origin, political opinions, religious or philosophical beliefs, as well as trade union membership personal ), provided to us for a better placement of your position (e.g. in the context of specific selections, data relating to membership in protected categories). The processing of such personal data will therefore be carried out, in full compliance with the provisions of Article 14 of the Organic Law no. 2004-63 of 27 July 2004 on the protection of personal data (*i.e.* processing is necessary to fulfill the obligations and exercise the specific rights of the data controller or the data subject in the field of labor law and social security and social protection or - as in the case of selections related to protected categories - processing is necessary for purposes of preventive medicine or occupational medicine).

In the event that any information is provided that is not pertinent to the purposes set forth within this document, RGI will notify you and immediately delete such information.

### 3. Legal basis and purpose of processing

Your information is needed to understand if your professional profile matches what we are looking for and to formulate a possible proposal for placement in the company.

Personal data provided will be processed, directly and/or through third parties, for the purpose of:

- I. To manage the proper conduct of the personnel selection process. Legal basis: pre-contractual/contractual.
- II. Data may also be evaluated for other job posts for which they are suitable with that specific job post. Legal basis: consent of the data subject.

The data that we ask you to provide through resume entry in the "Working at RGI" section through the appropriate sections in response to one of our advertisements and through the selection process as a whole, including through the direct administration or through sub-contractors appointed for this purpose, of questionnaires or technical tests (e.g. programming and foreign language) relevant to the assessment of professional skills in compliance with current regulations, are collected, through the computer platform of application management for the purpose of verifying whether the professional figure of the candidate

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

is in line with the needs of the company and, therefore, to select personnel to be included in our workforce.

RGI reserves the right to remove the data received from its archives if, upon inspection, they are found to be inaccurate, incomplete or out of date.

### 4. Methods of data processing

The personal data you provide on paper or computer will be treated by RGI with care and respect. RGI will take care of:

1. The collection and exact recording so that they match what you stated;
2. The organization and structuring of the same in order to manage the selection process;
3. adaptation or modification, extraction, consultation, use, communication by means of transmission, diffusion or any other form of making available, comparison or interconnection, limitation, storage in a form that allows your identification for a period of time not exceeding that necessary for the purposes for which they were collected, as better specified in Article 7;
4. Deletion or anonymization upon expiration of the period specified in Article 7.

### 5. Scope of data circulation

Your data will be communicated to as few people as possible, specifically authorized by RGI for the pursuit of the purposes described in paragraph 3 above; your data may be used by RGI personnel who have been assigned a specific role in the selection process and who have been given appropriate instructions regarding confidentiality.

#### 5.1 Access

Your personal data will be made accessible only to those within the company who need it due to their job description or hierarchical position (selection manager, reference manager during the term of selection, HR Team for pre-contractual fulfillments). These subjects will be properly instructed in order to avoid loss, destruction, unauthorized access or unauthorized processing of the data themselves.

Your personal data will also be made accessible to third parties who perform instrumental activities on behalf of the Controller and who will process the data as sub-contractors such as:

- Service companies (including IT) entrusted with specific management (management of computer systems, data entry activities, etc.);
- Companies in the same group to which RGI Tunisia belongs for administrative-organizational matters

## 5.2 Communication

Personal data may be communicated, to administrative authorities, judicial authorities and any competent Authority where required by the legislation in force.

## 6. Transfer of personal data

The Data Controller may transfer Data abroad To this end, the Data Controller undertakes to comply with all the requirements of the no. 2004-63 of 27 July 2004 on the protection of personal data in particular, Articles 47 et seq., in accordance with privacy regulations, and to adopt, the most appropriate safeguards (e.g., adequacy decisions or standard contractual clauses). In the event of data being transferred to a European Union member state, the processing carried out must comply with the applicable personal data protection requirements and, in particular, with the provisions of the GDPR Regulation.

## 7. Data retention

8. Subject to any statutory retention requirements that may apply, your data will be kept for as long as we deem necessary for your selection. The personal data that you have provided to us will be retained for the period necessary to make assessments regarding your recruitment needs and in any case for no longer than 24 months from the date of receipt. Upon the expiration of this period, in the absence of further consent, the data will be deleted or anonymized.

## 9. Rights of the data subject

As a data subject, you are entitled to exercise the following rights :

- to refuse consent and to withdraw the consent at any time during the processing;
- to request from the Data Controller access to the collected data ;
- to request from the Data Controller to correct, complete, rectify, update, modify, clarify or delete it, when it was proved that it is inaccurate, equivocal or prohibited for processing by law ;
- to obtain a copy of the personal data in clear language, in accordance with the content of the recordings and in an understandable way in the case of automatic processing ;
- to ask for destruction of the data when their collection or use were carried out in violation of the law ;
- to object to the processing of the personal data for good, legitimate and serious reasons ;
- to object to the communication to third parties of the personal data in order to exploit it for promotional purpose.

## 10. Appointment of the Data Protection Officer and Representative in the Union

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR CANDIDATES

According to GDPR, that may apply when we process personal data of EU data subjects, we inform you that we have appointed a data protection officer who can be contacted at the following email address: [dpo@rgigroup.com](mailto:dpo@rgigroup.com) We also inform you that we have appointed RGI S.p.A. as representative in the European Union for RGI Tunisia, whose can be contacted at the following contacts, Via San Gregorio 34, Milan, Italy.



### RGI Contacts

#### **RGI S.p.A.**

Registered Office:  
Via San Gregorio, 34  
20124 Milano

#### **RGI S.p.A.**

Operations:  
Via C. Pavese, 6  
10015 Ivrea (TO)  
Tel. +39 0125 935111