



**NOTICE ON THE PROCESSING OF CANDIDATES' PERSONAL DATA
PURSUANT TO THE FEDERAL ACT ON DATA PROTECTION (FADP) AND THE EUROPEAN GENERAL DATA PROTECTION
REGULATION (GDPR)**

1. DATA CONTROLLER

Immobiliare Mantegazza SA, represented by its Legal Representative pro tempore, with registered office at **Riva Paradiso 2, 6902 Paradiso**, acting as the Data Controller, informs data subjects that, in compliance with the Swiss Federal Act on Data Protection (FADP) and, where applicable, Regulation (EU) 2016/679 (GDPR), their personal data will be processed in accordance with the aforementioned legislation, in observance of the principles of fairness, lawfulness, proportionality, and transparency, while safeguarding confidentiality and the rights of data subjects.

2. PURPOSES OF THE PROCESSING

Candidates' personal data will be processed exclusively for purposes related to the management of recruitment procedures and the possible establishment of an employment or internship relationship with Immobiliare Mantegazza SA or its client companies.

Specifically:

- assessment of candidates' qualifications, skills, and suitability;
- management of recruitment processes and interviews;
- possible inclusion in databases for the coverage of future positions.

Data will not be used for purposes other than those indicated, unless a new explicit consent is obtained.

3. LEGAL BASIS AND JUSTIFICATION / PRINCIPLES OF LAWFULNESS

Under the FADP:

- for ordinary personal data, processing is based on the principles of lawfulness, good faith, and proportionality (Art. 6 FADP);
- for sensitive personal data or personality profiles, a justification is required, which may consist of consent, a legal obligation, or an overriding private or public interest (Art. 31 FADP).

Under the GDPR, where applicable, processing is based on one or more of the following legal grounds (Art. 6 GDPR):

- performance of pre-contractual or contractual measures at the request of the data subject;
- compliance with legal obligations;
- the Data Controller's legitimate interest in correctly managing recruitment procedures;
- explicit consent, where required (particularly in the case of special categories of data pursuant to Art. 9 GDPR).

Consent may be withdrawn at any time, without prejudice to the lawfulness of processing carried out prior to withdrawal.

4. METHODS OF PROCESSING

Processing will be carried out on paper and/or electronically by the Data Controller, by authorized personnel, and by any external processors, adopting appropriate technical and organizational measures to ensure the confidentiality, integrity, and availability of the data.

Data will not be subject to profiling or to decisions based solely on automated processing.

5. PERSONAL DATA PROCESSED

Processing concerns only personal data provided by candidates, including:

- identification and contact details (name, surname, address, telephone, e-mail);
- information regarding educational and professional background;
- any sensitive data under the FADP and/or special categories of data under the GDPR (e.g. health data, religious beliefs, trade union membership), processed only if strictly necessary and with the candidate's prior consent.

Such data may include, for example:

- opinions or activities of a religious, philosophical, or political nature;
- health-related data;
- lifestyle or intimate sphere information;
- data relating to racial or ethnic origin;

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- data uniquely identifying a natural person;
- data concerning administrative or criminal proceedings and sanctions;
- data concerning social welfare measures.

6. DATA DISCLOSURE AND RECIPIENTS

Personal data may be processed by:

- employees and collaborators of the Data Controller, duly authorized;
- consultants or service providers (e.g., legal, administrative, IT), where necessary for the purposes indicated above.

Data will be stored at the Data Controller's premises and those of its designated Processors, within the Swiss Confederation.

Any transfers to EU/EEA countries are based on the mutual adequacy decision between Switzerland and the EU.

Should it become necessary to transfer data outside Switzerland and the EU/EEA, this will only occur towards countries ensuring an adequate level of protection or subject to the adoption of appropriate safeguards (e.g., standard contractual clauses).

An updated list of external processors is available upon request.

7. DATA RETENTION PERIOD

Data will be retained for the time strictly necessary for the recruitment process and, in any case, no longer than 24 months from receipt of the application documents.

Once this period has expired, data will be deleted or anonymized, unless renewed consent is provided for an additional 24 months.

Data will nevertheless be erased earlier if no longer necessary for recruitment purposes.

8. DATA SUBJECTS' RIGHTS

Under the Swiss Federal Act on Data Protection (FADP), data subjects may exercise their rights against the Data Controller at any time by contacting us using the details below:

Phone: **+41(0)91 960 54 54**

E-mail: davidepianca@mantegazza.ch

Postal address: **Riva Paradiso 2 - Casella Postale 6902 Lugano 2 Caselle**

Data subjects have the right to:

- access their personal data and obtain a copy;
- request the rectification or update of inaccurate or incomplete data;
- request the deletion of data that are no longer necessary or unlawfully processed;
- restrict processing in certain cases provided by law;
- request the transmission of their data to themselves or to third parties, where technically feasible (Art. 28 FADP);
- object to processing on legitimate grounds.

Where processing is based on consent, this may be withdrawn at any time, without prejudice to the lawfulness of prior processing.

Data subjects retain the right in Switzerland to lodge a complaint with the [Federal Data Protection and Information Commissioner \(FDPIC\) \(www.edoeb.admin.ch/en\)](http://www.edoeb.admin.ch/en).

Where the GDPR applies, data subjects also have the right to lodge a complaint with the competent Supervisory Authority in the EU Member State where they reside or work, or with the [European Data Protection Supervisor \(EDPS\) \(www.edps.europa.eu/en\)](http://www.edps.europa.eu/en).

Further Information | Amendments | Effective Date

The Data Controller reserves the right to amend or update this notice. Any updates will be made available to data subjects, indicating the date of entry into force.

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