



DR.VRANJES
— F I R E N Z E —

DR. VRANJES FIRENZE S.p.A.

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P.I./C.F. IT 06511260488 - Registro Imprese FI 06511260488

Capitale Sociale € 50.000,00 i.v. - REA Firenze n. 633927

IBAN: IT 70 E 01030 37720 000000280871 - SWIFT: PASCITM1K89

www.drvranches.it - info@drvranches.it

This policy governs the processing of personal data resulting from the submission of curriculum vitae by post to **Dr. Vranjes Firenze SpA**, registered office in Via S. Pertini, 5 - Locality Antella 50012 Bagno a Ripoli (FI), Italy, P.IVA 06511260488; by email to info@drvranches.it - privacy@drvranches.it, (hereinafter the "**Owner**"), in compliance with the current data protection regulations, including, in particular, EU Regulation 2016/679 (hereinafter "GDPR")

1. Identity and contact details of the Data Controller

The Data Controller is **Dr. Vranjes Firenze S.p.A.**

As the Owner is established in the Italian territory, no representative has been appointed.

2. Contact details of the Data Protection Officer

The Data Controller has appointed Andrea d'Anna as Data Protection Officer and can be contacted by email to dpo@drvranches.it.

3. Purpose of processing and legal basis of processing

a) In relation to the submission of unsolicited curriculum vitae sent by the data subject, the processing of personal data is carried out in order to examine and evaluate the curriculum vitae; this legitimate interest of the owner acts as the legal basis for the processing.

b) In relation to curriculum vitae sent by the data subject following a request orally or in writing by the Data Controller, the processing of personal data is carried out in order to examine and evaluate the curriculum vitae; processing the information in order to establish the contract and/or for the management of pre-contractual relationships constitutes a legal basis for the processing.

4. Method of expression of consent

The data subject is not required to give consent for the owner to proceed with the processing of the personal



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data.

5. Methods of processing and rational

- In relation to the personal data processed and stored for the purposes referred to in point 3, a) of this document, the processing will be done on paper, electronically and through the use of CRM-type management software and email systems which allow for the fulfilment of contractual obligations.
- In relation to the personal data processed and stored for the purposes referred to in point 3, b) of this document, the processing will be done on paper, electronically and through the use of CRM-type management software and email systems which allow for the fulfilment of contractual obligations.

6. Source of personal data

Only the data provided by the data subject contained within the curriculum vitae will be processed.

7. Recipients and any categories of recipients of personal data

The personal data may be disclosed to the following:

- communications companies that carry out commercial communication and profiling activities on behalf of the Data Controller, who are classified as data processors;
- companies offering information society services, including, in particular, those that offer hosting services;
- to companies in charge of the corporate ICT service.

8. Categories of data

The personal data of the data subject will be processed.

The data subject is required to omit particular sensitive data from the curriculum vitae, i.e. personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership, and data relating to the person's health, sexual life or sexual orientation. Any curriculum vitae containing such data



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will be immediately deleted by the Data Controller.

9. Transfer of data

The Data Controller intends to transfer personal data to a third country or to an international organisation. Such entities could be represented, for example, by:

- communications companies that carry out communication activities on behalf of the Data Controller;
- companies that offer information society services, including those in particular that offer hosting services;
- communication service providers of the company.

The transfer of personal data to such entities, if established in a third country or an international organisation, is carried out in accordance with a decision from the European Commission, which verified that the third country, the territory or one or more specific sectors within the third country, or the international organisation in question guarantee an adequate level of protection of its rights. In any event, the Data Controller, if it deems appropriate in any case, reserves the right to enter into separate agreements with these entities to ensure adequate security measures are adopted, including organisational ones, aimed at ensuring appropriate guarantees regarding privacy rights. Google Inc., in particular, has contractually bound itself to ensure adequate protection of the rights of the data subject. The data can thus be transferred to the following countries:

The UK, United States of America. To obtain a copy of this data or the place where it was made available, send the relevant request to the following address: privacy@drvranches.it.

10. Retention period of personal data

The personal data processed for the purposes referred to in point 3, a) and b) of this document will be kept for a period not exceeding 5 years from the submission date of the curriculum vitae.

11. Optional consent and the consequences of non-acceptance

- In relation to the personal data processed and stored for the purposes referred to in point 3, a) of this document, the processing of personal data is based on the legitimate interest of the owner; in case of a failure to process, it would not be possible to comply with the requests of the person concerned.
- In relation to personal data processed and stored for the purposes referred to in point 3, b) of this document, the communication of personal data is a contractual obligation and a necessary requirement for the performance



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of pre-contractual negotiations and for the execution of the contract. The data subject has the right to provide personal data; in case of failure to communicate such data, however, it will not be possible to conclude any contract or carry out any contractual negotiation.

11. Rights of the data subject

11.1 Right of objection

The data subject has the right to object at any time to the processing of personal data concerning him, pursuant to art. 6, paragraph 1, e) or f) of the GDPR, including profiling based on these provisions. The Data Controller shall abstain from further processing of personal data unless it demonstrates the existence of compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject or for the assessment, the exercise or defence of a right in a court of law.

11.2 Other rights

The Data Controller undertakes to inform the data subject of the existence of the following rights applicable to him:

- **Right of access of the data subject:** the data subject has the right to obtain confirmation from the Data Controller that personal data concerning him is being processed and in this event, to obtain access to personal data and specific information, in compliance with art. 15 of the GDPR.
- **Right of rectification:** the data subject has the right to obtain the correction of inaccurate personal data concerning him held by the Data Controller without unreasonable delay. Taking into account the purposes of the processing, the data subject has the right to supplement incomplete personal data, also by providing an additional declaration, in accordance with art. 16 of the GDPR
- **Right to erasure of data, including the right to withdraw consent:** the data subject has the right to obtain the deletion of personal data concerning him from the Data Controller without unreasonable delay and the Data Controller has the obligation to delete personal data without unreasonable delay; the data subject has the right to withdraw his consent if the reasons set out in art. 17 of the GDPR are met; in this case, the right to revocation can be exercised by the data subject at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation.
- **Right to restriction of processing:** the data subject has the right to obtain from the Data Controller the restriction of processing when the assumptions defined by art. 18 of the GDPR are met.
- **Right to data portability:** the data subject has the right to receive (in a structured, commonly used and machine-readable format), personal data concerning him provided to the Data Controller and has the right to transmit such data to other persons without restrictions by the Owner in the event that the conditions specified



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by art. 20 of the GDPR are satisfied.

12. Exercise of rights

Any requests to exercise any of the rights set out in this document, including, in particular, the right to erasure and the right to revoke the consent given must be addressed directly to the Data Controller at the email address privacy@drvranches.it.

Alternatively, you can exercise your rights by sending the request by a registered letter addressed to Via S. Pertini, 5 - Locality Antella 50012 Bagno a Ripoli (FI).

13. Accessibility of information

Personal information can be requested from the Data Controller. If expressly requested by the data subject, the information may also be provided orally on the basis that the identity of the data subject is proven, by means of a telephone call to the Data Controller.