

## INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF REGULATION (EU) 2016/679

### Recruitment - Career Day

*May 2026 Edition*

Pursuant to Art. 13 of Regulation (EU) 2016/679 (GDPR), this information notice concerns your personal data—meaning information relating to you—processed by Witapp s.r.l. (hereinafter also “Witapp”, “Controller” or “Data Controller”) within the scope of personnel selection activities through the publication and management of job advertisements on LinkedIn or through spontaneous applications via the “Careers” section of the website <https://www.witapp.it/careers/>

### 1. Data Controller

**1.1.** The Data Controller is Witapp s.r.l., with registered office in Via Benedetto Dei 2A, 50127, Florence (FI), Tax Code/VAT No. 06611730489.

**1.2.** Contact details:: a) tel: 0550197553; b) e-mail: [privacy@witapp.it](mailto:privacy@witapp.it)

### 2. Data Processed, Purposes and Legal Basis of Processing, Nature of Provision

**2.1. Personal data processed.** Data provided during the application and/or participation in the Career Day, CV content and special categories of personal data voluntarily provided by the candidate (e.g., membership of protected categories pursuant to Law 68/99).

Furthermore, the image of the candidate or participant may be processed through photographs or video recordings during the event.

**2.2. Purposes and legal basis of processing.** The purposes of the processing are to evaluate the application for potential employment and to ensure compliance with the minimum employment percentages reserved for members of protected categories under Law 68/99. Images in photos and films will be used for institutional marketing purposes as described in the attached image release form.

**2.3. Legal basis of processing.** Legal basis of processing are:

- Regarding personal data (identification data, telephone and email contacts, and all content in the CV): Art. 6(1)(b) GDPR, as processing is necessary for the performance of pre-contractual measures taken at the data subject's request.;
- Regarding special categories of data in the CV: Art. 9(2)(b), as processing is necessary for the purposes of carrying out the obligations of the controller in the field of employment law.
- Regarding the images: free and unconditional consent pursuant to Art. 6(1)(a) GDPR. Consent may be withdrawn at any time, by contacting the Data Controller at the contact points indicated in this information notice.

**2.4. Nature of the provision of personal data.** Providing data is optional; however, failure to provide it will prevent the Controller from evaluating the application and pursuing the indicated purposes.

Refusal of consent for image processing carries no consequences for the relationship with the Controller.

**2.5.** Data is generally collected directly from the data subject via the submission of a CV..

### 3. Recipients of Personal Data

- 3.1. Personal data may be disclosed to: a) Public and private bodies, including following inspections or audits; b) Subjects who may access your data by virtue of provisions of law, secondary or Union legislation. These subjects shall act as independent controllers.
- 3.2. Data will be made accessible to employees and collaborators of the controller, authorised to process data pursuant to Art. 29 GDPR, and to processors appointed pursuant to Art. 28 GDPR. Such subjects follow the instructions provided by the controller.. You may request the complete list of data processors by submitting a specific request to the Data Controller at one of the contact points indicated in this information notice.
- 3.3. Personal data may also be processed by social network platforms used by the Controller, which act as independent controllers. Such platforms qualify as independent data controllers and, therefore, reference is made to their respective privacy policies.

#### **4. Transfer to Third Countries outside the EU**

- 4.1. Your data will not be transferred outside the EEA unless required by specific legal obligations.
- 4.2. Should a transfer to organisations established outside the EEA become necessary, the controller ensures that such transfer will be carried out according to Articles 44 to 50 GDPR.

#### **5. Data retention**

- 5.1. Personal data provided during the application will be stored for 12 months from the receipt of the curriculum vitae, unless an employment procedure is initiated.

#### **6. Rights of the Data Subject, Complaint**

- 6.1. You may exercise the following rights: a) right of access (Art. 15); b) right to rectification (Art. 16); c) right to erasure (right to be forgotten) (Art. 17); d) right to restriction of processing (Art. 18); e) the right to notification regarding rectification/erasure/restriction (Art. 19); f) right to data portability (Art. 20); g) right to object (Art. 21); h) right to lodge a complaint with a supervisory authority (Art. 77).
- 6.2. To exercise your rights, you may contact the Data Controller at the contact points indicated in this information notice.

#### **7. Further Information**

- 7.1. The Data Controller remains available for any need for clarification and, should the processing be modified with respect to that described in this document, the Controller will provide a specific updated information notice.
- 7.2. The protection of your data and compliance with the principles provided for by the legislation, with particular reference to the principle of transparency, are values of primary importance to us; we would be grateful if you would help us by reporting any misunderstandings of this document or by suggesting improvements to the Controller's contact details as indicated above.

#### **8. Contact Details of the Data Protection Officer (DPO)**

- 8.1. The Data Protection Officer is è Sicurdata S.r.l., who can be contacted for all issues related to the processing of personal data and to the exercise of rights under the GDPR at the following contact details: a) tel: 055750808; b) e-mail: [dpo.sicurdata@opendata.it](mailto:dpo.sicurdata@opendata.it).

### 9. Consent to Processing and Image Release

The Undersigned \_\_\_\_\_, C.F. \_\_\_\_\_ in the capacity of participant in the Career Day, declares to have read the information notice and:

[ ] Grants consent to the processing of their image for institutional marketing purposes, as described in the information notice and in the following image release form and

#### **AUTHORISES WITAPP S.R.L.**

- 1) To carry out photographic filming, video filming, and audio recordings of their image or voice, including by authorised third parties and by any technical means and on any medium;
- 2) To use such recordings, including the use of authorised third parties and by any technical means and on any medium, in whole or in part, for events, television, radio, Internet, and audiovisual media in Italy and abroad;
- 3) To reproduce and publish images, including by authorised third parties and by any technical means and on any medium, in corporate catalogues, flyers, publications, the company intranet, company premises, social media profiles, and the corporate website.

The Undersigned declares to have no claims against Witapp s.r.l. regarding the use of the images. The use is free of charge. Use is prohibited in cases prejudicial to honour, reputation, or decorum pursuant to Art. 97 L. 633/1941 and Art. 10 of the Civil Code.

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