



PRIVACY POLICY - CANDIDATES

Introduction

The aim of this Privacy Policy is to ensure that you are fully informed on how **Eurospin Malta Limited (C 102792)** will collect and process your personal data in the circumstances indicated hereunder.

Eurospin Malta Limited ("**we**", "**us**", "**our**" or "**Eurospin**") respects your privacy and values its importance and is committed towards protecting your personal data.

The purpose of this Privacy Policy is to set out the basis on which we will process your personal data in relation to your application.

This Privacy Policy informs you about personal data that we may collect and how we will handle it, and also informs you about (i) our obligations to process your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you.

We process your data in an appropriate and lawful manner, in accordance with the Data Protection Act (Chapter 586 of the Laws of Malta) (the "**Act**"), as may be amended or replaced from time to time, and the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**Regulation**" or the "**GDPR**").

1. Important Information

We are the data controllers as defined by the current relevant data protection laws and regulations. We control any personal data which we collect or receive and which we process in connection with your application and the recruitment process.

Contact Details:

- Data Protection Officer: dpo.malta@eurospin.it
- Company Registration Number: C 102792
- Registered Address: Suite 1, Icon Business Centre, Zone 1, Central Business District, Mdina Road, Birkirkara CBD1010, Malta.

You have the right to file a complaint at any time to the competent supervisory authority on data protection matters, the Office of the Information and Data Protection Commissioner (the "IDPC") (<https://idpc.org.mt/en/Pages/Home.aspx>).

We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please contact us using the details provided above, beforehand.

Changes to the Privacy Policy and Your Duty to Inform Us of Changes

We keep our Privacy Policy under regular review and reserve the right to update it as necessary. We will notify you of any significant changes.

It is important that the personal data we hold about you is correct and updated at all times. Please inform us of any changes to your personal data.

EUROSPIN MALTA LTD

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2. The Information We Collect About You

The information we collect, store and use may include:

Identity and Contact Data: This will include all contact information, including name and surname, telephone and mobile number, residential address, and email address.

Professional and curricular data: This will include information related to curricular data.

Sensitive Data: We may also collect and/or receive data relating to the state of health or other sensitive data if communicated by you through your CV. Any other personal information that you voluntarily choose to provide to us, such as CV's photos. We ask that you do not include health information or other special categories of data in your CV or application unless strictly necessary for the role you are applying for.

Website and Technical Data: Where you apply through our online recruitment platform or website, we may also collect technical data such as your IP address, device and browser information, and metadata relating to your form submissions. For information on cookies and similar technologies, please refer to our Cookie Policy.

Apart from the data specified above, we will only collect any special categories of personal data about you if strictly necessary and with appropriate legal basis under GDPR Article 9.

If you fail to provide certain information when requested, we may not be in a position to fulfil our obligations under the recruitment process; therefore, any refusal to provide such information will result in your application being withdrawn.

3. Purposes for Which We Will Use Your Personal Data

We use your personal data to assess your suitability for the role you have applied for, to carry out the recruitment process and, where relevant, to prepare for the possible commencement of your employment. The specific purposes and their legal bases are set out in the table below.

Purpose	Examples	Lawful Basis for Processing
a) To carry out the recruitment process	The processing of your personal data takes place to carry out the recruitment of personnel by us including, by way of non-exhaustive example, the following activities: - the search for candidates for open positions; - the collection of applications and CV; - the examination of the CV received for an initial screening; - the organization of interviews; - the inclusion of the most suitable candidate.	The legal basis of the processing is the execution of pre-contractual measures adopted at the request of the interested party, pursuant to art. 6.1 lit. b) of the GDPR. In relation to the possible processing of sensitive data, the legal basis for the processing is the need to fulfil obligations and exercise specific rights in the field of employment and social security law, pursuant to Article 9.2(b) of the GDPR, subject to appropriate safeguards. We also keep your CV for future selections among the Group companies. In this case, the legal basis of the processing is our legitimate interest, pursuant to art. 6.1 lit. f) of the GDPR.

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b) To verify that the data provided is true using public information (including professional social network profiles).	The processing is limited only to information related to the aptitude and professional profile carried out in the least intrusive way possible, adopting all necessary measures to ensure a correct balance between the legitimate interest of the employer to control the data subject and the fundamental rights of candidates. Where such checks are carried out, this personal data is obtained from publicly available sources, including professional social networking profiles.	The legal basis of the processing is our legitimate interest pursuant to art. 6.1 lit. f) of the GDPR.
c) To demonstrate compliance with the Company and to establish, exercise and/or defend the Company's rights in court.	The processing of your personal data takes place to verify, exercise or defend a right in court.	The common data will be processed for our legitimate interest (Article 6.1 letter f) of the GDPR). Sensitive data relating will be processed to verify, exercise or defend a right in court (Article 9.2, letter f) of the GDPR).

Automated decision-making: We do not make decisions concerning candidates based solely on automated processing, including profiling.

4. Sharing of Data

The data may be disclosed to the companies of the Eurospin Group, in their capacity as independent Data Controller, for recruitment purposes, to subjects operating as independent data controller, such as public authorities or professional firms, or processed, on behalf of the Data Controller, by subjects who provide services functional to the pursuit of the above purposes (e.g. IT services or personnel selection), designated as Data Processors pursuant to Article 28 of the GDPR.

Furthermore, the data is processed by employees of the Eurospin Group Companies belonging to the corporate functions responsible for the pursuit of the purposes indicated above, who have been expressly authorised to process the data and who have received adequate operating instructions.

5. How and for how long is your data stored?

We will retain personal data collected for the duration of a legitimate business need, and in any case, for the following retention periods:

The data retained for the purpose "*a) To carry out the search and selection of candidates*" will be kept for the entire duration of the selection activity with respect to the individual selection. For an additional **2 years** for future selections.

The data stored for the purpose "*b) To verify that the data provided corresponds to the truth using public information*" will be retained for the entire duration of the recruitment process.

The data stored for the purpose "*c) If necessary, to demonstrate compliance with the Company's compliance and to ascertain, exercise and/or defend the Company's rights in court*" will be retained for the entire duration of the litigation, until the terms of appeal have been exhausted. Data collected for compliance purposes will be kept for a maximum of **5 years**.



Once the above retention periods have expired, the data will be destroyed or made anonymous, compatibly with the technical procedures of deletion and backup.

Your data is collected and stored within the European Union.

6. Your Rights

You have the following rights in relation to your personal data:

- **Right of Access:** You can request access to your personal data by contacting dpo.malta@eurospin.it;
- **Right to Rectification:** You can request correction or updating of inaccurate personal data;
- **Right to Erasure:** You can request deletion of your personal data in certain circumstances;
- **Right to Data Portability:** You have a right to request transfer of your personal data in a machine-readable electronic format;
- **Right to Object:** You can object to the processing of your personal information in certain circumstances;
- **Right to Restriction:** You can ask us to restrict processing of your personal information;
- **Right to Withdraw Consent:** Where processing is based on consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing conducted on other lawful grounds;
- **Right to Complain:** You have the right to complain to the Office of the Information and Data Protection Commissioner (the "IDPC") (<https://idpc.org.mt/en/Pages/Home.aspx>) about our collection and use of your personal information.

To exercise any of these rights, please contact us at dpo.malta@eurospin.it. We respond to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws within one month of receipt.

7. Conclusion

We reserve the right to make changes to this Policy in the future and will notify you of any material changes. This policy is reviewed annually to ensure continued compliance with applicable data protection laws.

If you have any questions regarding this Privacy Policy, or if you would like to send us your comments, please contact us at dpo.malta@eurospin.it.