

## Privacy Notice for Candidate

1. **The controller** responsible for processing your personal data is PRA Group Italy S.r.l., with registered office in Italy, Milan, 20154, Via Enrico Tazzoli n. 6 (later referred to as: “we”, “the Company”).

2. **Contact point** for data protection matters:

- a) e-mail: [hr-dataprotection@pragroup.eu](mailto:hr-dataprotection@pragroup.eu)
- b) post: PRA Group Italy S.r.l., with registered office in Milano, 20154, Via Enrico Tazzoli n. 6
- c) pec: [pragroupitalysrl@legalmail.it](mailto:pragroupitalysrl@legalmail.it)

3. **Purpose** of the processing of personal data and **legal basis**:

<b>Application:</b> activities carried out in the course of receiving and assessing applications, including reviewing general applications or applications for specific jobs which may be received directly from you or via a recruitment agency. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age and nationality.	Article 6(1)(a) of the GDPR we process your application on the basis of your consent;
<b>Assessment:</b> activities carried out in the course of the recruitment process to ensure your suitability for roles our company, which may involve the processing of your CV, assessment centre interviews (such as a role play, group exercise or presentation), interview (face to face, telephone or video), technical assessments or other appropriate tests for the role, shortlisting the candidates;	Article 6(1)(f) of the GDPR on the basis of our legitimate interest as your potential employer;
<b>Defend our interest:</b> after the end of the recruitment process, we will process your data in order to defend against claims that result from the recruitment process.	Article 6(1)(f) of the GDPR on the basis of our legitimate interest as your potential employer;
<b>Future recruitment:</b> If you agree to the storage of your data after the recruitment process in which you participated, we may retain your application for future recruitments that we may carry out.	Article 6(1)(a) of the GDPR we process your application on the basis of your consent;

If you are **the successful candidate** (we have offered you to conclude an employment contract) additionally we will process your data in purposes set out below.

<b>Pre-contractual process:</b> we will process your personal data prior to entering an employment contract in order to prepare Your contract and the measures necessary for you to start performing your employment duties	Article 6(1)(b) and (f) of the GDPR on the basis of pre-contractual processing, legal obligation and our legitimate interest, as your future employer
<b>Pre-employment screening (PES):</b> pre-employment screening activities carried out in-house or third party provider for the purposes of identity verification, right to work, education qualifications checks, employment checks, credit history and criminal record check;	Article 6(1)(f) of the GDPR on the basis of our legitimate interest as your potential employer;
<b>Verification of sanctions lists (including OFAC).</b> We check whether your data is on sanctions lists, including lists maintained by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC). If your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA (for more information about data transfers, read section 5 of data recipients),	Article 6(1)(f) of the GDPR on the basis of our legitimate interest to implement internal group policies;

4. **Source of data**

If you did not send us your application directly, we have obtained your data from your CV, job application and from other data you may have provided to the recruitment agency or the person that has recommended you in our referral program.

5. **Data recipients and data transfer**

- a) For the abovementioned purpose(s) we can disclose your data to the following recipients: (i) to any of our related affiliates within the PRA Group of companies; (ii) recruitment and other third party agencies; (iii) vendors that provide us with services, such as IT service providers or HR system provider;
- b) Your personal data may be **transferred to a recipient in a third country**<sup>1</sup>. for example, in connection with the use of a foreign IT subcontractor or in connection with the provision of intra-group services. Additionally, if your data appears on the OFAC sanction lists, we will share this information with PRA Group, Inc., which will mean the transfer of your data to the USA;
- c) **The basis for the transfer** of your personal data may be a decision of the European Commission stating the appropriate level of protection or standard data protection clauses. You have the right to obtain from us copy of the standard contractual clauses and information on the scope of the personal data that has been transferred.

6. **Data storage**

Your personal data is stored for the duration of the recruitment activity and after its completion:

<sup>1</sup> A third country is a country located outside the European Economic Area (“EEA”). The EEA includes the Member States of the European Union, Iceland, Liechtenstein and Norway.

- a) for unsuccessful candidates personal data will be kept for a period necessary to defend our interests but for no longer than 12 months;
- b) for unsuccessful candidates who have given us additional consent to process their data for the future recruitments data will be kept for no longer than 12 months;
- c) if the candidate is successful, the documents will be transferred to the employee staff file and the applicable legal timeframes will be applicable.

#### 7. Your rights

We would also like to inform you that you have the following **rights**:

- a) right to access your personal data, i.e. obtain information about the processing of your data and obtain a copy of it – Article 15 of the GDPR
- b) right to rectify your personal data - Article 16 of the GDPR
- c) right to request the deletion of your data ("right to be forgotten"). This right is not an absolute right and, in some cases, specified in the GDPR we will not be able to comply with your request - Article 17 of the GDPR
- d) right to restriction of processing - Article 18 of the GDPR
- e) right to data portability - Article 20 of the GDPR
- f) right to object to the processing of your data, to the extent that we base it on our legitimate interest - Article 21 of the GDPR
- g) right to not to be subject to a decision based solely on automated processing including profiling – Article 22 of the GDPR
- h) right to lodge a complaint with the competent supervisory authority, if you believe that your personal data is processed unlawfully. The competent supervisory authority in Italy, it is the Garante per la Protezione dei Dati Personali.

#### 8. Right to withdraw a consent

Where processing of your personal data is based on consent given to us for one or more specific purposes, you may **withdraw your consent** at any time providing it will not affect the lawfulness of processing based on consent before its withdrawal. If you wish to withdraw your consent, please contact us. You can find our contact details in point 2.

#### 9. Automated decision-making

Your personal data is not subject to automated decision-making.

#### 10. Requirement to provide data

Providing data in the recruitment process is voluntary, but necessary to participate in the recruitment procedure. Failure to provide required personal data may mean that we will not be able to consider your application. Providing data for the purpose of collecting data necessary before concluding a contract with the selected candidate is a necessary condition for conclusion of an employment contract. Failure to provide data will prevent the conclusion of the contract.

#### 11. Contact details of the data protection officer

- a) e-mail: [rpd@pragroup.it](mailto:rpd@pragroup.it)
- b) post: PRA Group Italy S.r.l., with registered office in Milano, 20154, Via Enrico Tazzoli n. 6 with the note "Data Protection Officer"