

**INTRODUCTION**

With EU Regulation 679/2016, laying down provisions for the protection of individuals with regard to the processing of personal data, LAMPRE POLSKA Sp. Z o.o with headquarters in ul. Wschodnia, 8 - 99-300 Kutno (hereinafter referred to as "organization") as Data Controller, is required to provide some information regarding the use of personal data. The Internal data processor appointed by the data controller is Accountant Anita Wykretowicz.

**SOURCE OF DATA AND TYPE OF DATA PROCESSED**



Personal data acquired by the organization may be collected:

- directly from the person concerned, who can communicate them by answering specific advertisements published online (e.g. on the company website) and also by free application
- at open sources (e.g. public lists of universities or training institutions, etc.)
- at third parties in the event that the organization acquires data from agencies for the recruitment /selection of personnel, schools, institutions, etc..

For data collected not directly from the interested party, this policy is provided at the time of registration and in any case no later than the first communication.

If the existing relationship requires it, the data processed are: personal data (personal data, data contained in the CV, photos, any documents, etc.) and, where necessary, special data such as sensitive data.

In particular, in the course of personnel recruitment activities, the organization may acquire data that the law defines as "sensitive", i.e. data from which one may deduce, among other things, racial and ethnic origin, religious beliefs, political opinions, membership of parties, trade unions, associations or organisations with a religious, philosophical, political or trade union nature, as well as health conditions.

In any case, all these data are processed in compliance with the aforementioned regulation and the confidentiality obligations that have always inspired the activities of the organization.

**DATA RETENTION PERIOD**



The data are kept only for the period necessary for the purposes of selection for a specific position and, subject to optional consent, also for future positions of potential interest and in any case within the terms provided for by laws, rules and national and EU regulations to which the organization must adhere.

In case of free application, data can be stored to make selections on positions that the organization considers relevant to the candidate's profile. A periodic annual check will be carried out on the data processed and on the possibility of deleting them if they are no longer necessary for the intended purposes. The curricula vitae, in particular, will be safely destroyed in case they are not considered topical or of interest any more, after a minimum period of 12 months beyond which any return will no longer be possible.

**PROVISION OF DATA AND CONSEQUENCES OF FAILURE TO PROVIDE THEM**

**MANDATORY/NOT MANDATORY**



The provision of data must be considered mandatory with regard to the necessary processing that the organization must carry out to meet the needs of knowledge and assessment of candidates in the search and selection of personnel to fill positions, including possibly at related organizations and / or members of the group, as well as legal obligations, rules, regulations. Failure to provide such data may make it impossible for the organization to proceed with the process of recruitment and selection of personnel.

The purposes for which the provision of data is mandatory are marked with the following symbol:



Consent is not mandatory for all other purposes and, if given, may be revoked at any time by the person concerned.


The purposes for which the provision of data is NOT mandatory are marked with the following symbol:





**PURPOSE OF DATA PROCESSING**



The data are processed within the normal activity of the organization and according to the following purposes. If the data controller intends to further process the personal data for a purpose other than the one for which they were collected, it will provide the data subject with all the necessary information in advance and will request his/her consent if needed.

 Recruitment and selection of personnel to be included within the organization for a specific position, including the purposes of legitimate interest or related administrative requirements, the implementation and management of obligations under laws, regulations and national and EU legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies.

 Retention of the data of the interested party for the purposes of recruitment and selection of personnel for future work positions to be included within the organization.

 Acquisition and transfer of data to other companies of the Group and / or affiliates for purposes of research and selection of personnel.

**LEGAL BASIS OF DATA PROCESSING**



The data are processed for the above purposes, not only on the basis of consent (purposes number 2 and 3), but also in order to comply with a contractual/pre-contractual, legal, regulatory obligation, as well as instructions given by authorities empowered to do so and by supervisory and control bodies (purpose number 1). The explicit legal references updated to their latest state of revision that set out the obligations or requirements on the basis of which the processing of data (including sensitive data) may be carried out are available for consultation at the Data Controller and, in any case, are part of current EU law as well as of the Member State to which the data controller is subject.

**METHODS OF DATA PROCESSING**



The processing of personal data is carried out using manual, computer and electronic tools with logics strictly related to the purposes and in any case so as to ensure the safety and confidentiality of the data. The documents are filed both electronically and in paper form. Below is some essential information.



The collection of personal data is limited to the minimum necessary for each specific purpose of the processing



The processing of personal data shall be limited to the purposes for which they were collected



The storage of personal data is limited to the minimum necessary for each specific purpose of the processing



We do not provide personal data to commercial third parties without your consent



The sale or rental of personal data are not carried out

**SCOPE OF DISSEMINATION AND CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED**



The personal data collected by the organization may be communicated, within the limits strictly relevant to the purposes mentioned above, also to the following subjects or categories of subjects. For all the purposes mentioned above, the communication of data also derives from a legal or contractual obligation or is a necessary requirement for the conclusion of a contract. In the absence of the above communications, the relationship/contract may not be completely fulfilled. The data will not be transferred to subjects in third countries outside the EU.

- ✓ Persons to whom the communication is required by law, regulation or national and EC legislation
- ✓ Employment consultants for the purpose of the analysis and resolution of any problems related to possible employment
- ✓ Organizations of the group or affiliates for purposes concerning the relationship with the organization and for purposes provided by the process of recruitment and selection of personnel
- ✓ Independent firms specialising in consultancy for the recruitment and selection of personnel and the management of related administrative formalities

**RIGHTS OF THE DATA SUBJECT**



At any time, the data subject may exercise his/her rights with respect to the Data Controller or Data Processor, pursuant to EU Regulation 679/2016 by contacting LAMPRE Polska Sp. z o.o and the Data Processor Accountant Anita Wykretowicz to the following contact details: lampre.polska@lampre.com - Tel. +48 24 357.57.00 - Fax +48 24 357.57.15 – LAMPRE Polska ul. Wschodnia, 8 - 99-300 Kutno (for written communication). In order to guarantee the correct exercise of the rights, the data subject must be unequivocally identifiable. The organization undertakes to provide feedback within 30 days and, if unable to meet these deadlines, to justify any extension of the time limits. The feedback will be free of charge except in cases of groundlessness (e.g. there are no data regarding the applicant) or excessive requests (e.g. repetitive over time) for which a contribution can be charged not exceeding the costs actually incurred for the research carried out in the specific case. The rights relating to personal data concerning deceased persons may be exercised by those who have an interest of their own or act to protect the person concerned or for family reasons worthy of protection. The data subject may also lodge a complaint with the supervisory authority.

In case of violation of personal data suffered by the organization, the data controller will notify the violation to the competent authority within 72 hours of the event and will also communicate the event to the data subject, except for cases of exclusion under the law.

THE DATA SUBJECT HAS THE RIGHT TO REQUEST: Access, correction, cancellation of personal data, limitation of processing and portability of data.  
THE DATA SUBJECT HAS THE RIGHT TO OPPOSE: the processing and revoke his/her consent at any time without prejudice to the lawfulness of the processing based on the consent expressed before the revocation.

**THE RIGHT TO BE INFORMED OF**

- Origin of personal data
- Categories of processed data
- Purposes and methods of processing
- Retention time
- logic applied in case of processing carried out with the aid of electronic tools
- identification data of the Data Controller and the Data Processor
- subjects and categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as managers or persons in charge, also in Third Countries.
- existence of the profiling process

**THE RIGHT TO BE OBTAIN**

- confirmation of the existence of their personal data and that such data are made available in an intelligible form
- updating, correction, addition and limitation of data
- cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed in violation of the law (including data that need not be kept for the purposes for which they were collected or subsequently processed)
- certification that the operations referred to in the above paragraphs have also been notified to those to whom the data were communicated or disseminated, except where this requirement proves impossible or involves a manifestly disproportionate use of means compared to the right protected by the organization
- data portability (direct transmission from one data controller to another)
- copy of processed data

**THE RIGHT TO OPPOSE**

- the processing of personal data concerning the data subject, including profiling for legitimate reasons, even though they are relevant to the purpose of collection
- the processing of personal data concerning the data subject for the purposes of: sending advertising materials, direct selling, carrying out market research, commercial communications
- the processing of data processed for purposes of scientific or historical research or for statistical purposes, except in cases of public interest in the processing






**POLICY AND REQUEST FOR CONSENT TO THE PROCESSING OF PERSONAL DATA  
FOR CANDIDATES FOR RECRUITMENT**

Rev. 2018

LAMPRE POLSKA Sp. z o.o. – ul. Wschodnia, 8 - 99-300 Kutno - (Province Łódzkie) - Poland

NAME AND SURNAME ..... ADDRESS .....

Provided that, as defined in the notice that the undersigned expressly declares to have received and read, the execution of the process of recruitment of personnel by the organization may involve the need to process data (including sensitive data) of the data subject and aware that, in the absence of the provision of such data (and related communications) the process of recruitment of personnel may not be fully exercised, the undersigned freely expresses consent in the manner described below.

PURPOSES FOR WHICH CONSENT IS REQUIRED		I GIVE MY CONSENT	I DENY MY CONSENT
	Recruitment and selection of personnel to be included within the organization for a specific position, including the purposes of legitimate interest or related administrative requirements, the implementation and management of obligations under laws, regulations and national and EU legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies.	<input type="checkbox"/>	<input type="checkbox"/>
	Retention of the data of the interested party for the purposes of recruitment and selection of personnel for future work positions to be included within the organization.	<input type="checkbox"/>	<input type="checkbox"/>
	Acquisition and transfer of data to other companies of the Group and / or affiliates for purposes of research and selection of personnel.	<input type="checkbox"/>	<input type="checkbox"/>

In the case of a minor, the consent must be given by the person having parental responsibility.

SIGNATURE ..... DATE .....