

NATIONAL AGENCY FOR ACTIVE LABOUR MARKET POLICIES – Privacy Policy for RESTOINCAMPO APP
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PRIVACY POLICY
pursuant to Article 13 and following, EU Regulation 2016/679 (“GDPR”)

The "Restoincampo" APP is the application that the National Agency for Active Labour Market Policies (hereinafter "ANPAL") makes available to all individuals wishing to offer services (job requests and labour supply) in the agricultural sector in order to facilitate intermediation between labour supply and demand.

In order to further develop intermediation between labour supply and demand, the “Restoincampo” APP is integrated with the MyANPAL platform, the national portal through which ANPAL provides services related to active labour market policies. In particular, this APP is integrated with ANPAL's "job listing request" service (hereinafter "JLR" for brevity), which allows workers to create and manage *curricula vitae* (CVs), as well as allowing companies to create and manage job listings. In this regard, we would like to point out that workers' CVs will only be accessible by companies in an anonymised format, i.e. with personal details such as first name, surname, residential address and contact details (email address and telephone number) not visible. When a company makes a contact request, the system will send the worker a notification to the email address provided upon signup. Once logged in, the worker can authorise/deny the request to view the full CV, including all personal details.

For more information on the JLR service, please access the MyANPAL digital desk with the same user credentials as used for the "Restoincampo" APP and see the information on the processing of personal data.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller for your personal data is **ANPAL** (hereinafter also "**the Data Controller**") with its registered office at Via Fornovo, 8, Rome, in the person of its *pro tempore* legal representative and the Director General, as per the responsibilities and tasks entrusted to them.

The Data Controller has appointed a Data Protection Officer ("**Data Protection Officer**" or "**DPO**") who can be contacted via email at the email address responsabileprotezionedatiAnpal@anpal.gov.it.

2. CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

With reference to your use of the APP, the following categories of personal data will be collected and processed:

A. For users registered as "**Workers**":

- a.1) Common personal data such as personal details (first name, surname, tax code, place and date of birth), contact details (telephone number, email address), nationality, municipality and address of residence and domicile, and a double-sided copy of a valid identity document;
- a.2) Information relating to the Availability indicated by you, such as your desired occupation or role and geographical areas (region, province, municipality);
- a.3) Information relating to applications submitted for individual job listings created by companies;
- a.4) Information relating to the mutual interests expressed by the worker and employer (so-called "*matches*"), namely following the acceptance of your application for a specific job listing by the company.

- B. For users registered as a **"Company"**, as their Legal Representative:
- b.1) Common personal data such as personal details (first name, surname, tax code, place and date of birth), nationality, contact details (telephone number, email address), and a double-sided copy of a valid identity document;
 - b.2) Data relating to your company, such as company name, VAT number/tax code, registered office;
 - b.3) Information relating to the mutual interests expressed by the worker and employer (so-called *"matches"*), namely following your acceptance of the application submitted by a worker for a specific job listing.

With reference to the contact details (i.e. email address and telephone number) pertaining to you, we inform you that they will be visible to other users of the APP and/or of the JLR only in the case of a "match" between a job request and a job listing, i.e. only if a single company accepts the application submitted by a single worker for a specific job listing.

We also inform you that the APP has a feature exclusively for companies that allows you to create a job listing by acquiring your GPS location using a special geolocation feature.

In this regard, we would like to inform you that the use of this feature is temporary and completely optional, and that the information relating to the detected location will be processed exclusively to allow you to link the geographical coordinates with the job listing created.

3. PURPOSES OF THE PROCESSING AND LEGAL BASIS

- a. **Provision of technological tools to support intermediation between labour supply and demand in the agricultural sector.**

The legal basis for the processing of your personal data for the purpose referred to in point a) is the performance of the functions and tasks in the public interest attributed to ANPAL pursuant to and for the purposes of Legislative Decree 150/2015, with particular reference to art. 9 of said Decree, namely the activities of "preparing technological tools to support intermediation between labour supply and demand".

4. COMMUNICATION AND TRANSFER OF YOUR DATA

ANPAL will be able to communicate your personal data to subjects, duly appointed as Data Processors, whom it employs to carry out activities related to the purposes referred to in para. 3 of this Policy, such as (by way of example) suppliers of management/maintenance services for the websites and electronic/telecommunications tools used.

The list of Data Processors is updated by ANPAL and can be requested by contacting the agency via email at the email address responsabileprotezionedatiAnpal@anpal.gov.it.

The Personal Data referred to in paragraph 2 of this Policy may also be shared with Public Bodies and Administrations, as well as with other subjects belonging to the National Network of services for labour market policies pursuant to Art. 1 of Legislative Decree 150/2015, which will process it on a case-by-case basis as Independent Data Controllers.

In particular, to allow intermediation between labour demand and supply, your Personal Data as referred to in paragraph 2 of this Policy will be shared with other users of the APP and/or the JLR service, who will process it as Independent Data Controllers.

There is no integration with social networks.

The management and storage of personal data takes place in the cloud and on servers located within the European Union, owned by and/or available to the Data Controller and/or third-party companies responsible for processing, duly appointed as Data Processors. The transfer of data abroad to non-EU countries is not

envisaged and will not be carried out.
Your personal data will not be disclosed to other parties.

5. STORAGE PERIOD

The data pertaining to you will be processed by ANPAL for as long as necessary to achieve the purposes referred to in paragraph 3 of this Policy.

In particular, the data entered by the user when signing up for the APP, referred to in points a.1 (for "worker" users) and b.1 and b.2 (for "company" users), will be kept for a period of 12 months, beginning when an account deactivation request is made. This period may be extended for any reason or cause that justifies further storage, such as ANPAL's defence of its rights.

However, with regard to the data relating to the applications submitted and the *matches* generated by the interests expressed by users, i.e. the data referred to in points a.2, a.3 and a.4 (for "worker" users) and b.3 (for "company" users), this will be kept for a period of 24 months, starting from the deadline of the *matches* generated, as necessary to achieve the purposes pursued by ANPAL, including monitoring the effectiveness of the APP with regard to bringing together labour supply and demand.

6. YOUR RIGHTS AS A DATA SUBJECT

During the period in which ANPAL is in possession of or is processing your Personal Data, you, as a Data Subject, may exercise the following rights at any time:

- Right of access (art. 15, GDPR) – You have the right to obtain confirmation as to whether your personal data is being processed, as well as the right to receive all information relating to this processing;
- Right to rectification (art. 16, GDPR) – You have the right to have your personal data in our possession rectified if it is incomplete or incorrect;
- Right to erasure (art. 17, GDPR) – In certain circumstances, you have the right to request the erasure of your personal data stored in our archives if it is not relevant to the continuation of the contractual relationship or required by law;
- Right to restrict processing (art. 18, GDPR) – If certain conditions occur, you have the right to restrict the processing of your personal data if it is not relevant for the continuation of the contractual relationship or required by law;
- Right to data portability (art. 20, GDPR) – You have the right to obtain the transfer of your personal data from our possession to another controller;
- Right to object (art. 21, GDPR) – You have the right to object to the processing of your data;
- Right to lodge a complaint with the Supervisory Authority – In the event that ANPAL refuses to comply with your access requests, the reasons for its refusal will be provided. Should you wish to make a complaint regarding the methods employed by ANPAL to process your data, or regarding the handling of a complaint you have made, you have the right to submit a request directly to the Supervisory Authority.

Such requests may be sent to ANPAL by email to the email address responsabileprotezionedatiAnpal@anpal.gov.it.