

---

# INFORMATION ON THE PROCESSING OF CANDIDATES' PERSONAL DATA

ARTICLES 13 AND 14 REG. (EU) 2016/679

---

Joint Controllers  
and contact details

Umana S.p.A. | [privacy@umana.it](mailto:privacy@umana.it)  
Umana Forma S.r.l. | [privacy@umanaforma.it](mailto:privacy@umanaforma.it)  
U.Form. S.r.l. | [privacy@uform.eu](mailto:privacy@uform.eu)  
Uomo e Impresa S.r.l. | [privacy@uomoeimpresa.it](mailto:privacy@uomoeimpresa.it)

---

Data Protection Officer's contact details

[dpo@umana.it](mailto:dpo@umana.it)

---

In accordance with and for the purposes of Articles 13 and 14 of EU Regulation 2016/679 ("GDPR"), below we provide information regarding how we process the personal data of individuals who contact one or more of the Joint Controllers through the channels provided for this purpose (e.g. website, branch offices, online job portals, professional social networks) with the aim of utilizing one or more of the services offered (hereinafter "**Candidates**").

## ABOUT US

---

Umana S.p.A. ("**Umana**") is a temporary work agency authorized by the Italian Ministry of Labour and Social Policies to the exercise of all the activities referred to in Article 4, paragraph 1, letter a) of Legislative Decree n. 276/2003 (Prot. N. 1181-SG of 13/12/2004) and it is registered in the Register of temporary employment agencies.

On the basis of this authorization, Umana can provide several services, such as:

- **temporary agency work;**
- **staff leasing** (permanent staffing);
- **labour market intermediation**, even in relation to the employment of disabled people and disadvantaged workers;
- **search and selection** of professional figures to be submitted to client companies;
- **training;**
- **active labour policies** ("Politiche attive del lavoro"): an area that offers a complete range of services (e.g.: orientation, coaching, scouting, assessment and counselling, etc.), also by making available initiatives promoted by the Public Administration;
- **professional outplacement.**

Umana is part of a network of companies belonging to the same business group, each with specific expertise in providing the aforementioned services.

In order to optimize the services offered and increase opportunities for improving candidates' employment prospects, Umana has entered into a joint controller agreement pursuant to Article 26 of the GDPR with the following group companies:

1. **Umana Forma S.r.l.**, for the provision of training courses in all Italian regions;
2. **U.Form. S.r.l.** for the provision of training courses for the only Lombardia region;
3. **Uomo e Impresa S.r.l.** for professional outplacement.

This agreement allows the companies listed above (hereinafter "**Joint Controllers**") to access the personal data of Candidates and process such data for the purpose of offering them a range of services designed

---

to improve their employment prospects.

Furthermore, Umana has adhered to the "Code of Conduct for the Employment Agency Sector" ("Codice di Condotta per il settore delle Agenzie per il lavoro") drafted pursuant to Article 40 of the GDPR (see Provision n. 12 of January 11, 2024, published in the Official Gazette of the Italian Republic General Series n.. 55 of March 6, 2024).

## DATA PROCESSED AND SOURCE OF THE DATA

In relation to applications for one or more job positions or for our services received through our channels (e.g., website, branch offices, etc.) or those of our partners, or in connection with the recruitment and selection activities carried out by our staff (e.g., introductory interviews, identification and evaluation of candidates, etc.), we may **collect from Candidates** the following categories of personal data:

1. **GENERAL PERSONAL DATA**, such as:
  - a. **Identifying data** (e.g. s. name, surname, place and date of birth, fiscal code, image, gender, civil status, citizenship, nationality, home address, etc.);
  - b. **contact data** (e.g. phone number, e-mail address);
  - c. **personal data included in the Curriculum Vitae** (es. educational level, training and/or professional experiences, language proficiency, etc.);
  - d. **information provided regarding the job position** (e.g., availability, restrictions, employment preferences, license/certification/qualification status, etc.);
  - e. **technical data** (es. account login records);
  - f. **information regarding the candidate's qualifications and aptitude for performing specific jobs**.
2. **SPECIAL CATEGORIES OF PERSONAL DATA** (art. 9 GDPR), such as:
  - a. **data concerning health** (es. belonging to legally protected category, disability);
  - b. **data revealing racial or ethnic origin**.
3. **JUDICIAL DATA** (art. 10 GDPR, art. 2-octies legislative decree n. 196/2003):
  - a. **data relating to criminal convictions and offences** (e.g. certificate from the Judicial Records Register), only if required by law (es. legislative decree n. 39/2014).

The processing of Candidates' personal data will be carried out by authorized personnel using paper-based and/or electronic means, in compliance with current data protection laws and company policies.

To this end, we will implement all appropriate security measures to ensure the confidentiality, integrity, and availability of personal data, and we will process only the personal data of Candidates strictly necessary to conduct recruitment and selection activities or to provide the other services mentioned above, disregarding any personal data that is not relevant to such activities.

In some cases, we may obtain professional information about Candidates from **third-party sources** such as, by way of example and without limitation, job portals, professional social networks, public entities, other employment agencies within the scope of the sector's National Collective Labour Agreement (CCNL), our client companies and partners, and previous employers.

In such cases, upon initial contact and in any event within one month of receipt, we will inform the data subject of the source from which the aforementioned information was obtained.

## PURPOSES AND LEGAL BASIS OF THE PROCESSING

Given the services provided by Umana and the Joint Controllers, the primary purpose for which we will process Candidates' personal data is to support them throughout their professional development, placing them at the center of a service designed to improve their employment status through the search for job opportunities, their successful entry into the workforce, and their professional growth, including professional training activities.

---

The provision of personal data for the purposes listed below is not mandatory; however, failure to do so will prevent Candidates from applying for job offers at Umana and/or from using the services of Umana and of the Joint Controllers.

Specifically, we will process Candidates' data for the following **purposes**:

**PURPOSE A)**

**to manage the registration through the channels provided for this purpose (e.g., website, branch office, online job portals, professional social networks) and related activities (e.g., support).**

The legal basis for this processing is the performance of a contract (Article 6(1)(b) of the GDPR).

**PURPOSE B)**

**to carry out all activities related to and/or necessary for the recruitment and selection service related to job offers managed by Umana, either on its own behalf or at clients' request** (e.g., receiving and reviewing CVs, conducting interviews or individual and/or group assessments, sharing professional profiles— anonymized where possible— with potential employers, structured and ongoing communication— via email, telephone, or other channels, in both “one-to-one” and “one-to-many” formats, after filtering recipients based on geographic, professional, etc.— aimed at keeping Candidates constantly informed about professional and/or training opportunities and to collect any information that may be useful for updating their professional profiles).

The legal basis for this processing is taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the GDPR); with regard to the processing of data falling within the special categories referred to in Article 9 of the GDPR, in the necessity to fulfill the obligations and exercise the specific rights of the data controller or the data subject in the field of employment, social security and social protection law (Article 9(2)(b) of the GDPR); with regard to the processing of judicial data, such processing may only be carried out if authorized by a law or regulation, in the cases provided for by law (Article 6(1)(c) of the GDPR, Article 10 of the GDPR, Article 2-octies of Legislative Decree 196/2003).

**PURPOSE C)**

**to carry out all activities related to and/or instrumental to the services provided by Umana and the Joint Controllers, such as, by way of example, active labor market policies, training programs, and career guidance activities.**

The legal basis for this processing is taking steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) of the GDPR); with regard to the processing of data falling under the special categories pursuant to Article 9 of the GDPR, in the necessity to fulfill the obligations and exercise the specific rights of the data controller or the data subject in matters of employment, social security and social protection law (Article 9(2)(b) of the GDPR); with regard to the processing of judicial data, such processing may only be carried out if authorized by a law or regulation, in the cases provided for by law (Article 6.1(c) of the GDPR, Article 10 of the GDPR, Article 2-octies of Legislative Decree 196/2003).

**PURPOSE D)**

**to obtain professional information from the Candidates' previous employers.**

We may obtain professional information from the Candidates' previous employers only with the Candidates' consent (Article 6.1(a) of the GDPR).

**PURPOSE E)**

**to develop and improve our services and processes/systems** (e.g., by sending surveys or questionnaires, analyzing and testing information systems, analyzing aggregated data for statistical purposes, etc.). To this end, we may also use, always under human supervision, artificial intelligence tools/systems to enhance the performance of our services and the IT systems we use, without this constituting an automated decision-making process, including profiling, that produces legal effects on Candidates pursuant to Article 22 of the GDPR.

---

---

The legal basis lies in the legitimate interest of Umana and the Joint Controllers in improving their services and organization (Article 6(1)(f) of the GDPR). This interest has been subject to a specific balancing test, and the data subject may object at any time, in the manner indicated below.

#### **PURPOSE F)**

**to send, via email, telephone, or messaging apps (e.g., WhatsApp), promotional communications regarding additional initiatives by Umana or by the Joint Controllers, other than those referred to in subparagraph (b).**

The legal basis for this processing is the consent of the Candidates (Article 6(1)(a) of the GDPR).

#### **PURPOSE G)**

**to determine, exercise, or defend the rights of Umana, the Joint Controllers, and/or third parties in any forum.**

The legal basis lies in Umana's legitimate interest in protecting its own rights and/or those of third parties in the appropriate forums (Article 6.1(f) of the GDPR). This interest has been subject to a specific balancing test.

#### **PURPOSE H)**

**to comply with legal obligations applicable to Umana and the Joint Controllers (e.g., providing information to law enforcement agencies upon specific request, handling requests from data subjects).**

The legal basis for this processing is compliance with a legal obligation (Article 6(1)(c) of the GDPR).

## **DATA RETENTION PERIOD**

---

We will store Candidates' data for as long as necessary to achieve the purposes listed above.

With regard to **purposes A), B), and C)**, we will retain Candidates' personal data for a period of **48 months** from the last activity performed for purposes related to or instrumental to the provision of such services (e.g., creation of a profile on the Umana website, access to and/or updating of the profile on the Umana website by Candidates, contact between Umana staff or Joint Controllers and Candidates, interviews at a branch, etc.). To ensure the proper processing of Candidates' data, we will periodically update the database, particularly as the aforementioned retention period nears its expiration, which will recommence following each update. The update procedure will generally consist of sending Candidates communications containing a link to this policy and instructions on how to request the deletion of their data at any time, without prejudice to any further rights provided by law.

If Candidates do not complete the creation of their profile on the Umana website, the requested personal data will be deleted from our records within the necessary technical timeframe.

With regard to **purpose D)**, we will retain Candidates' personal data for a period of **48 months** from the last activity performed for purposes related to or instrumental to the provision of such services (e.g., creation of a profile on the Umana website, access to and/or updating of the profile on the Umana website by Candidates, contacts between Umana staff or Joint Controllers and Candidates, interviews at a branch, etc.), or, if earlier, until consent is revoked. To ensure the proper processing of Candidates' data, we will periodically update the database, particularly as the aforementioned retention period nears its expiration, which will recommence following each update. The update procedure will generally consist of sending Candidates communications containing a link to this policy and instructions on how to request the deletion of their data at any time, without prejudice to any further rights provided by law.

We will store Candidates' personal data for the same period of time in connection with **purpose E)**, subject to the Candidates' right to object to the processing at any time.

With regard to **purpose F)**, we will retain Candidates' personal data for a period of **24 months**, or until consent is withdrawn, whichever comes first.

With regard to **purpose G)**, we will retain Candidates' personal data for the time necessary to protect rights (e.g., for the duration of any litigation).

---

With regard to **purpose H**), we will retain Candidates' personal data for as long as the legal obligation persists.

Once the retention periods indicated above have expired, all data will be deleted or anonymized, in accordance with technical deletion and backup procedures.

## RECIPIENTS OF THE PERSONAL DATA

---

To achieve the purposes set forth above, we may disclose Candidates' data to third parties, who may act as independent data controllers or data processors (in accordance with the provisions of Article 28 of the GDPR), such as:

1. Service providers (in particular, but not limited to, IT), on whom we rely to deliver our services;
2. Partner companies and clients interested in the services of Umana (e.g., recruitment and selection, temporary staffing) and of the Joint Controllers offering job positions, with whom we may share the profile—where possible, anonymized—of Candidates in order to complete the selection process;
3. Sector-specific bilateral bodies and interprofessional funds (e.g., Forma.Temp), in the context of funded training;
4. Public administrations and public bodies (e.g., employment centers);
5. Law enforcement authorities, upon specific request;
6. Consultants and freelancers;
7. Banks and insurance companies.

Personal data will not be transferred outside the European Union. In the event that data is transferred outside the European Union, the transfer will take place in accordance with the conditions set forth in Articles 44 et seq. of the GDPR, such as the Commission's adequacy decisions, standard contractual clauses, or other safeguards deemed adequate.

Candidates' personal data will not be disseminated.

## RIGHTS OF THE DATA SUBJECTS

---

In accordance with the GDPR, Candidates, as data subjects, may exercise the following rights by writing to the email address [privacy@umana.it](mailto:privacy@umana.it):

**Right of access:** it is the right to obtain from the controller confirmation as to whether or not personal data concerning them, and, where that is the case, access to the personal data and the following information: the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed, the period for which the personal data will be stored, any available information as to their source, the rights provided for under the GDPR, the existence of automated decision-making;

**Right to rectification:** it is the right to obtain the rectification of inaccurate personal data concerning them;

**Right to erasure:** it is the right to obtain the erasure of personal data concerning them;

**Right to restriction of processing:** it is the right to obtain restriction of processing where one of the following applies: i) the accuracy of the personal data is contested by the data subject; ii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; iii) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;

**Right to object:** it is the right to object at any time to processing of personal data concerning them;

**Right to withdraw the consent:** it is the right to withdraw consent at any time, with respect to processing based on such consent, without affecting the lawfulness of processing based on consent given before its withdrawal;

**Right to data portability:** it is the right to receive the personal data processed in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

We will provide information on action taken on a request under articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request.

Depending on the complexity and number of requests received, we will inform Candidates within one month of receiving the request if it is necessary to extend the aforementioned term by two months, providing all relevant information.

Furthermore, if Candidates believe that their data is being processed in violation of the GDPR, they have **the right to lodge a complaint with the competent data protection supervisory authority** (the Italian Data Protection Authority, Garante per la protezione dei dati personali) or with **the Monitoring Body for the Employment Agency sector** (Organismo di Monitoraggio per il settore delle Agenzie per il Lavoro).

This privacy policy may be updated periodically by the data controller. Any changes will be duly communicated to Candidates via Umana's website and other channels.

This document is drawn up in the Italian and English languages. The Italian version shall be the only legally binding version, the English version being provided for explanatory purposes only. In the event of any discrepancy or conflict between the two versions, the Italian version shall prevail.

Last updated: March 31, 2026

---