

This “Privacy Policy” has been drafted by Artemis SrL with registered office in Milan, Corso Giacomo Matteotti, 1, 20121 (the “**Company**”) pursuant to article 13 of Regulation EC No. 679 of 2016 (“GDPR”) and by Legislative Decree 10 August 2018, n. 101., aimed at describing the management terms of web site “www.artemis-careerconsulting.com” (the “**Site**”) and the services made available through the Site by the same Company (the “**Services**”) in respect of the processing of personal data of users consulting the Site and/or benefit of the Services (the “**Users**”). This information is provided in respect of the Site only and is not purported to cover other web sites accessed by the User through links.

## **1. PERSONAL DATA COLLECTION**

### **1.1 Site Registration**

The Site can be freely navigated without any preliminary registration.

However, in order to access certain Services made available to the Users, the latter are required to preliminary register with a dedicated section of the Site.

Artemis may utilize the User’s data only upon express consent given by the latter.

In particular, registration is necessary for:

The personal data will be collected and processed in the context of our professional activity and therefore:

- for personnel research and selection projects: both in the case of spontaneous application and in the case that you were contacted by us, your consent enables us to correctly evaluate you skills, attitudes, potential and professional expectations in relation to a mapping of the reference working market (specific positions, roles and career dynamics) in order to meet the recruiting needs of our corporate Clients and hence consider and/or propose your application for a certain position and to contact you in the future for working positions/opportunities potentially of your interest.

The personal data being subject to processing are such information included in the curriculum vitae submitted by the candidate, concerning generalities, study degrees, professional and working experiences, contractual and economic treatment, references, motivation to change, aspirations, preferences etc.

### **1.2 Site navigation and cookies**

#### **Navigation data**

Information systems and software procedures that govern the functioning of the Site do acquire, during their normal operations, certain personal data whose transmission is implicit within the internet communication protocols.

Such being information that are not collected to be associated with identified persons, but, due to their own nature, they might, by way of elaborations and associations with third party data, allow users’ identification.

This category of data includes IP addresses or MAC addresses of computers operated by users that connect with the Site, URI (Uniform Resource Identifier) addresses of the required resources, the time of the request, the method employed for submitting the request to the server, the size of the file obtained in response, the numeric code identifying the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user’s informatics environment.

These data are utilised for the sole purpose of retrieving anonymous statistical information about the use of the Site and checking its proper functioning.

## Cookies

Cookies are files or parts of information that are acquired on the computer's hard disk of the user (files sent by the server of the internet site to the browser of the user of such site) during site navigation.

Cookies memorised in the User's computer cannot be utilised to recall any data from his/her hard disk, transmit informatics viruses nor identifying and exploit his/her email address. Each cookie is unique in respect of the browser e device operated by the User for connecting to the Site.

### • Types of cookies used

The Company only uses the so-called **technical** cookies, i.e. cookies needed to speed up and increase the navigation and exploitation of the Site.

More specifically they are:

Necessary Cookies Such cookies are essential for navigating the Site; they enable functions such as the self-identification, the validation, the management of a navigation session as well as fraud prevention.

Functional Cookies Such cookies provide additional functionalities and allow to trace User's choices, including language selection or the size of the font adopted.

Performance Cookies Such cookies keep trace of the pages that User visits more frequently and of the relevant activities of the Site. They also enable immediate identification and solution of all technical problems that User might encounter during the navigation of the Site. The information kept by such cookies are aggregated, anonymous and are not purported to collect personal data for marketing purposes.

Session Cookies Session cookies are aimed at speeding up internet traffic analysis and facilitating the access by the User to the services offered by the Site. No personal data of the Users is acquired in this respect by the Site. Cookies are not used for transmitting personal information, nor the so called persistent nor users' identification systems are used. The use of session cookies is strictly limited to the transmission of session identification protocols (constituted by random numbers generated by the server) necessary for enabling the safe and efficient navigation of the Site. Session cookies used by this Site avoid recourse of information techniques that may jeopardize the confidentiality of users' navigation and do not permit to acquire the users' personal identification data.

Proprietary Cookies The above mentioned categories of cookies are directly used by the Company; they are, therefore, "proprietary cookies" deriving from the Site.

### • Users' rights

Cookies will be used on the Site only to the extent that the relevant person has granted her/his consent to this end.

In order to deactivate the use of technical proprietary cookies User shall modify le her/his browser preferences in accordance with the foregoing.

Should the data subject refuses to use the cookies, they will not be utilised but the provision of services will be reduced. In such latter case, some of the Site functions might not perfectly work and some services might not be available. Cookies cannot be used and will not be used to collect the email addresses of the Users, nor they will be utilised in order to obtain information from the hard disk or personal and/or sensitive data.

Each User may nevertheless deactivate cookies through the software adopted for internet surfing (the so called "browser"). Many browsers are set up in such a way to accept cookies in absence of different instructions by Users.

The Company warns Users to check the settings of their browser in respect of cookies and regulate them according to their preferences.

The management of cookies and Users' preferences are different depending on the browser and are described in the browser guidance menu, which explains how to modify cookies preferences.

- For Internet Explorer™: [click here](#)
- For Safari™ Safari su iPhone, iPad, o iPod touch: [click here](#)
- For Chrome™: [click here](#)
- For Firefox™: [click here](#)
- For Opera™: [click here](#)

In order to manage her/his preferences relating to cookies' utilization, User may also refer to internet site <http://www.youronlinechoices.com/it> and modify cookies settings at her/his own discretion.

## **2. DATA PROTECTION CONTROLLER AND PROCESSOR**

The Users' personal data protection controller is Artemis SrL with registered office in Milan, Corso Giacomo Matteotti, 1, 20121.

For any request, information and/or clarification or question about personal data processing, you are kindly invited to submit a written request to the Company at the following email address:

**[privacy@artemis-cc.com](mailto:privacy@artemis-cc.com)**

## **3. MANAGEMENT AND PURPOSE OF THE DATA PROCESSING**

### **3.1 Filing and access to data**

As personal data controller, the Company appointed as External Processors all natural and legal that process data in the name and on behalf of Artemis.

The Company has individually appointed in writing the "Persons authorised to the personal data processing" ("Officers") and specified the context, instructions, modalities and purpose of the data processing, in relation to the corporate position of each person. All Officers are instructed and formed about the proper data processing and use of the information system.

Data are therefore processed only by personnel, including technicians, entrusted with the processing or officers entrusted with the maintenance and/or update/improvement of the Site, in accordance with principles of correctness, lawfulness, transparency, adequacy and non-excessiveness with respect to the collection purposes and subsequent processing.

The database is accessed exclusively by enabled persons through modalities that assure its protection and confidentiality, due to the adoption of security measures designed to prevent the loss of data, unlawful and/or incorrect use, as well as unauthorised access.

Personal data will be filed for a period of time not exceeding that which is necessary to pursue the above purposes or to comply with specific obligations of law.

### **3.2 Data processing in general**

The Company utilises Users' data in accordance with the Users' choices freely exercised by means of her/his consent, at the time of its collection or subsequently, and also in order to comply with the obligations set forth by EU laws, regulations or directives.

Pursuant to art. 5 of GDPR, personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject ("lawfulness, fairness and transparency");
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimisation”);
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed (“accuracy”);
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (“storage limitation”);
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss (“integrity and confidentiality”).

### **3.3 Processing operations subordinated to consent, communication and dissemination of data**

The Company may process Users’ personal data only upon express authorisation by the User by means of automated devices for the above referred purposes. In order to perfectly perform the activities requested by Users, the company will communicate the data provided by the latter to third party corporations, co-officers or external processors, entrusted with specific tasks.

In such context, personal data may be disclosed to principal client companies, entities or corporations potentially interested in the professional profile of the relevant user.

Such persons may have their seat inside or outside the European Union. In such latter case, data will be disclosed only to companies capable to ensure full compliance with all provisions of GDPR.

Personal data may be communicated to companies or offices affiliated with Artemis; moreover, they may be disclosed to subjects outside the Company’s organisation, such as consultant and professionals hired by the Company within the context of its business for aim and purposes linked to their engagement.

Users’ personal data will not be subject to dissemination.

### **3.4 External links**

The Site may connect or readdress users to other sites, services, social networks or external contents that are beyond the Company’s control. Once the User leaves the Site, the Company is not able to safeguard the security of Users’ personal data nor be held responsible for the protection and the privacy of any personal data that such User may have disclosed to other sites.

## **USERS’ RIGHTS**

In accordance with the provisions of artt. 15 to 22 of GDPR, User may:

1. Obtain confirmation of the existence of any personal data pertaining to her/him, even if not already registered, and their communication in understandable format.
2. The data subject has the right to obtain information as to:
  - a) the source of the personal data;
  - b) processing purpose and modalities;
  - c) the rationale applied in the case of processing by means of electronic devices;
  - d) identification details of the controller, the processor and the designated representatives;
  - e) the persons or categories of persons to which personal data may be disclosed or which may come into knowledge of due to their position as designated representative in the territory of the Country, processor or entrustment.
3. The data subject has the right to obtain:
  - a) the update, correction or, when of interest, the integration of data
  - b) the cancellation, anonymous transformation or the blockage of those data processed in breach of the law, including those in respect of which filing is not necessary for collection purposes and subsequent processing purposes;

- c) confirmation that the operations under letters a) and b) above have been disclosed, also in respect of their contents, to whom which data were communicated or disseminated, except for the case that compliance to such obligation is impossible or entails effort that are materially not proportional to the protected right.
4. The data subject has the right to challenge, in full or in part:
    - a) for legitimate reasons to the processing of personal data pertaining to her/him, even if not relevant to the data collection purpose;
  5. The data subject has the right to revoke at any time and without justification the consent to the processing of her/his personal data;
  6. The data subject has the right to obtain from the data processing controller the cancellation of her/his personal data without unjustified delay (right to be forgotten);
  7. The data subject has the right to complain before the supervisory Authority.

The above rights may be exercised by writing to the processing Controller at the following email address: [privacy@artemis-cc.com](mailto:privacy@artemis-cc.com)

#### **AMENDMENTS TO THIS PRIVACY POLICY**

Provided that the Company refrain from processing data other than upon express authorisation or request by each Users, this privacy policy may be subject to amendments due to change of laws or variations in the Company's data protection policies.

Each updated version of this Privacy Policy will be made available on the appropriate section of the Site: the Company warns therefore all Users to access the Site from time to time in order to be always informed about the latest uploaded version.