

PRIVACY POLICY – JOB APPLICANTS

Privacy notice on the processing of personal data pursuant to and for the purposes of Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

1. Kirey and Regulation (EU) 2016/679

Kirey S.r.l. and the Companies under its control and coordination (hereinafter "**Kirey Group**" or the "**Companies**", pursuant to and for the purposes of Article 2359 of the Italian Civil Code, has always considered the protection of personal data to be of fundamental importance, ensuring that the related processing, carried out by any means, whether automated or manual, is carried out in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter the "Regulation") and by the other applicable rules on the protection of personal data.

This privacy policy - the "**Policy**" - applies to Kirey Group's Job Applicants (hereinafter, "**Data Subjects**").

The Kirey Group companies that will jointly process Personal Data for the purposes referred to in paragraph 4 of this Policy below are the following:

- **Kirey S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Companies' Register, Tax Code and VAT Number 06729880960, R.E.A. 1910802;
- **Kubris S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 10084830966, R.E.A. 2503708;
- **Sibyl S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 06626020967, R.E.A. 2122766;
- **Kirey Advisory S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 13507320961, R.E.A. 2727430;
- **Kirey Forward S.r.l.** with registered office in Viale Francesco Restelli 5, 20124 - Milan, registered in the Milan Register of Companies, Tax Code and VAT Number 14410730965, R.E.A. 2781180.

The Companies, in order to ensure the correct management and execution of the joint ownership agreements, have identified the company Kirey S.r.l. as the subject to whom the processing activity indicated in this Policy is assigned. The aforementioned Companies act as Joint Data Controllers, meaning that these "two or more companies that jointly determine the purposes and means of processing" as provided for in Article 26 of the Regulation.

The Companies have signed a specific agreement pursuant to Article 26 of the GDPR, the deletion of which may be presented to the data subjects upon their specific request.

The Companies, as Joint Data Controllers, can be contacted through the following channels:

- By writing to Kirey Group at Kirey S.r.l., Viale Francesco Restelli 5, 20124 - Milan; or;
- Via email to privacy@kireygroup.com.

2. Data Protection Officer (DPO) of Kirey Group

To facilitate relations between the Data Subject and each Data Controller, Kirey Group has decided to adopt and appoint the figure of the Data Protection Officer (DPO) as provided for by Articles 37-39 of the Regulation. The DPO can be contacted by sending a written communication to the e-mail address dpo@kireygroup.com and/or by writing to the Data Protection Officer of Kirey Group at Kirey S.r.l., Viale Francesco Restelli 5, 20124 - Milan (hereinafter referred to as the "**DPO**").

Kirey S.r.l.

Società a socio unico

Sede legale: Viale Francesco Restelli 5, Milano

Capitale sociale: Euro 1.089.720,00 i.v.

Codice fiscale, partita IVA e numero di iscrizione al Registro delle Imprese di Milano: 06729880960

Numero REA: MI - 1910802

T +39 02 78 62 52 00

kirey@pec.it | www.kirey.it | www.kireygroup.com



ISO 14001
LL-C (Certification)



ISO 20000
LL-C (Certification)



ISO 45001
LL-C (Certification)



3. Processed data

In order to properly evaluate your application, the Companies need to process your personal data (i.e. name, surname, e-mail address, place of birth, image if present, etc.) contained in your CV, as well as collect additional personal data if necessary for the purposes of personnel selection and the formulation of the financial proposal (i.e., copies of educational qualifications, salary data, etc.). Furthermore, where necessary for the purposes of formulating the financial proposal, the Joint Controllers may process special categories of data relating to you (i.e., membership of protected categories, as well as data revealing your state of health, etc.) and/or judicial data in the case of senior positions and/or positions reporting directly to the CEO. The data is provided by you directly or through external recruitment and selection companies.

Furthermore, subject to your explicit and separate consent for future recruitment purposes, the Joint Controllers will process and retain your data in order to send to you e-mails for alternative or similar job openings.

4. Purpose of the data processing, legal basis, retention periods and disclosure requirements

Purpose 1) Selection and recruitment of personnel	
The purpose of data processing is to conduct activities related to the research and selection of employees, with a view to establishing an employment relationship, including for positions other than those for which the data subject has spontaneously applied; to analyse and evaluate CVs and store them for future selection processes; to manage applications in response to job offers published on the website and social network pages of the joint controllers; organising interviews via online platforms (e.g. Microsoft Teams); activities instrumental and ancillary to the selection process, such as, for example, copying educational qualifications, completing questionnaires relating to employment status, etc.	
Legal basis	The processing is necessary for the performance of pre-contractual activities carried out at the request of the data subject. The processing is therefore lawful pursuant to Article 6(1)(b) of the GDPR. The processing of data relating to possible inclusion in a protected category is required by EU and national labour law obligations ('Requirements relating to the processing of special categories of data in employment relationships' Gen. aut. No. 1/2016), therefore, data processing is pursuant to Article 9(2)(b) of the GDPR.
Disclosure requirements	The disclosure of data is mandatory, as it is essential for the fulfilment of contractual obligations. Failure to disclose data will prevent the Data Controller from establishing a contractual relationship with the Data Subject.
Retention period(s)	Personal data will be retained for 24 months (unless an interruptive or suspensive event occurs).

Purpose 2) Retention of data for alternative or similar job openings	
The purpose of data processing is to retain the data to send to you e-mails for alternative or similar job openings.	

Kirey S.r.l.

Società a socio unico

Sede legale: Viale Francesco Restelli 5, Milano

Capitale sociale: Euro 1.089.720,00 i.v.

Codice fiscale, partita IVA e numero di iscrizione al Registro delle Imprese di Milano: 06729880960

Numero REA: MI – 1910802

T +39 02 78 62 52 00

kirey@pec.it | www.kirey.it | www.kireygroup.com



ISO 14001
LL-C (Certification)



ISO 20000
LL-C (Certification)



ISO 45001
LL-C (Certification)



Legal basis	The data subject's explicit and freely given consent, pursuant to Article 6(1)(a) of the GDPR. For any potential processing of special categories of data (e.g., protected categories / disability status) contained in the CV and kept for future opportunities, the processing is based on consent pursuant to Article 9(2)(a) of the GDPR.
Disclosure requirements	The disclosure of data for this purpose is entirely optional and requires a specific, separate consent. Failure to provide consent will have no negative consequences on the evaluation of the application for the specific position currently open.
Retention period(s)	Personal data will be retained for 24 months from the date consent is granted, unless an interruptive/suspensive event occurs or consent is revoked earlier by the Data Subject.

5. Recipients or categories of recipients of Personal data

Personal data will not be shared. Personal data may, however, be communicated and processed: by specifically authorised parties acting pursuant to Article 29 of the GDPR and Article 2 quaterdecies of Italian Legislative Decree 101/2018 (including any system administrators appointed for this purpose, a list of whom can be requested from the Companies), under the authority of the Companies referred to in point 1), to external parties who will process the data as independent data controllers or data processors pursuant to Article 28 of the GDPR on the basis of specific instructions provided regarding the purposes and processing methods.

6. Data transfer to a third country and/or international organisation and safeguards

All Personal data collected and processed shall not be transferred outside the EEA.

7. Terms of data processing

The collection and processing of personal data will be carried out using manual, computerised and telematic tools and with logic that is strictly related to the declared purposes.

Please note that no fully automated decision-making processes are carried out

8. Data Subjects' rights

Data subjects may exercise their rights under Articles 15-22 of the GDPR by contacting each Company, sending an email to privacy@kireygroup.com or writing to the contacts listed in point 2) of this Privacy policy.

The Data Subject has the right, at any time, to request the Companies to access their personal data (Art. 15), to rectify (Art. 16) or erase (Art. 17) it, or to restrict its processing (Art. 18). The Companies shall communicate (Art. 19) to each of the recipients to whom the personal data have been transmitted any corrections, erasures or restrictions on processing that have been made. The Companies shall communicate these recipients to the data subject if the data subject so requests. In the cases provided for, you have the right to withdraw your consent without prejudice to the lawfulness of the processing based on consent prior to withdrawal. Furthermore, you have the right to object to the processing of your data, including for processing based on legitimate interest. If you believe that the processing of your Personal data is in breach of the GDPR provisions, you have the right to file a complaint to the competent Supervisory Authority of the Member State where you habitually reside or work, or in the place where the alleged breach of the Regulation occurred (contact details of the competent Data Protection Authority are available at the following <https://www.garanteprivacy.it/home/footer/contatti>), or to take appropriate legal actions

Latest update: **June 2026**

Kirey S.r.l.

Società a socio unico

Sede legale: Viale Francesco Restelli 5, Milano

Capitale sociale: Euro 1.089.720,00 i.v.

Codice fiscale, partita IVA e numero di iscrizione al Registro delle Imprese di Milano: 06729880960

Numero REA: MI – 1910802

T +39 02 78 62 52 00

kirey@pec.it | www.kirey.it | www.kireygroup.com



ISO 14001
LL-C (Certification)



ISO 20000
LL-C (Certification)



ISO 45001
LL-C (Certification)



UNI Pdr 125