

INFORMATION ON THE PROCESSING OF CANDIDATES' PERSONAL DATA
PURSUANT TO ART. 13 AND/OR 14 OF THE UK GENERAL DATA PROTECTION REGULATION ('UK GDPR')

	DATA CONTROLLER	Objectway Ltd (hereinafter, "Company") 1 Canada Square, Level 28, Canary Wharf - London E14 5AB (UK) E-mail address privacy@objectway.com
	DATA PROTECTION OFFICER (DPO)	The Data Protection Officer can be reached at dpo@objectway.com

	PERSONAL DATA PROCESSED
	<p>The Company will process your so-called <i>Common Data</i>, such as name, surname, place and date of birth, home address, e-mail address, phone number, educational qualification and work experience, as well as your so-called <i>Special Categories of Personal Data</i> (or "<i>Sensitive Data</i>"), such as information that may reveal your health status (such as belonging to protected categories), and any other data you may provide in your CV and/or in any other documentation submitted to the Company. The collection of Sensitive Data will be carried out only where strictly necessary for the recruiting and selection activity of the candidate. In the absence of such necessity, as well as in the absence of such circumstances, such Data will neither be requested nor considered when received and will be deleted immediately.</p> <p>The Company could also process data relating to criminal convictions and offences: these are the so-called <i>Judicial Data</i>, i.e., data that may reveal the existence of certain judicial measures subject to registration in the criminal record or the status of defendant or suspect. The collection of Judicial Data will be carried out solely with your explicit consent.</p> <p>Common Data, Sensitive Data and Judicial Data shall hereinafter be jointly referred to as "<i>Personal Data</i>" or "<i>Data</i>".</p>

	SOURCE OF DATA
Data are directly provided by you and/or collected from third parties, such as recruitment companies, temporary employment agencies, etc.	

	PURPOSE OF PROCESSING		LEGAL BASIS		RETENTION PERIOD
	To carry out recruitment and selection activities, including the retention of the Data for consideration in future recruitment processes.		As regards Common Data: <ul style="list-style-type: none"> • the processing is necessary for the performance of pre-contractual measures taken at your request, pursuant to 		Personal Data will be retained for the duration of the recruitment and selection process related to the specific position for which you have applied, and for an additional 6 months to consider your profile for future job

	<p>Article 6(1)(b) of the UK GDPR.</p> <p>As regards Sensitive Data:</p> <ul style="list-style-type: none"> the processing is necessary for the fulfilment of obligations and the exercise of specific rights of the Data Controller or the data subject in the field of employment, social security and social protection law, as authorized by Union or Member State law or by a collective agreement under Member State law, which provides appropriate safeguards for the fundamental rights and interests of the data subject (Article 9(2)(b) UK GDPR). <p>As regards Judicial Data:</p> <ul style="list-style-type: none"> the legal basis for the processing is your explicit consent pursuant to Art. 6(1)(a) UK GDPR and Article 10 UK GDPR. 	<p>opportunities, in accordance with applicable data retention policies.</p>
<p>Where necessary, to demonstrate the Company's compliance with legal obligations and to establish, exercise, or defend the Company's rights in court.</p>	<p>Common data will be processed based on the Controller's legitimate interest in ensuring compliance with applicable laws and regulations, and in establishing, exercising or defending a right in court (Art. 6.1(f) UK GDPR).</p> <p>Sensitive Data will be processed to establish, exercise or defend a right in court (Art. 9.2(f) UK GDPR).</p>	<p>Personal Data will be retained for compliance purposes for a maximum period of 6 months.</p> <p>In case of litigation, Data will be retained for the entire duration of the litigation and for as long as necessary to exhaust any applicable time limits for appeals.</p>
<p>After the aforementioned retention periods have expired, the Data will be destroyed or anonymised, in accordance with technical deletion protocols and backup procedures.</p>		

	OBLIGATION TO PROVIDE DATA
	<p>Depending on the role, the provision of certain Data is essential for the recruitment and selection process. Therefore, failure to provide the requested Data will prevent the Company from proceeding with the recruitment process and considering your application.</p>

	<p>RECIPIENTS OF DATA</p> <p>The Data may be communicated to third parties operating as independent Data Controllers, such as public authorities or professional firms, or processed on behalf of the Company by third parties that provide services functional to the pursuit of the above purposes (e.g., personnel selection services), appointed as Data Processors pursuant to Article 28 of the UK GDPR.</p>
	<p>SUBJECTS AUTHORISED TO PROCESS DATA</p> <p>The Data may be processed by employees, collaborators and/or Data Processors, who have been specifically authorized to process the Data and have received appropriate instructions for processing in accordance with the aforementioned purposes.</p>
	<p>TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EEA</p> <p>Processing related to the recruiting process may be carried out by service providers operating outside the European Economic Area ("EEA").</p> <p>The company undertakes to ensure that such transfers of personal data outside the EEA are carried out in accordance with the conditions of lawfulness set out in Articles 44 et seq. of Regulation (EU) 2016/679, in particular by entering into standard contractual clauses or, where applicable, through adequacy decisions of the European Commission, including the EU-US Data Privacy Framework for transfers to the United States, taking into account the case law of the Court of Justice of the European Union and the guidelines of the European Data Protection Board.</p>
	<p>RIGHTS OF THE DATA SUBJECT</p> <p>By contacting the Company's Data Protection Officer by e-mail at dpo@objectway.com, you may request access to your Data, its deletion, correction of inaccuracies, completion of incomplete Data or restriction of processing, as provided under Articles 15-21 of the UK GDPR, as well as object to processing based on legitimate interests of the Data Controller, for reasons related to your particular situation.</p> <p>In addition, where the processing is based on consent or on contract and is carried out by automated means, you have the right to receive the Data in a structured, commonly used and machine-readable format and, if technically feasible, to transfer them to another Data Controller without hindrance.</p> <p>You have the right to lodge a complaint with the Commissioner if you consider that the processing of your Data infringes the Regulation.</p>

Last update: 05/12/2025