



INFORMATION ON PERSONAL DATA PROCESSING collaborators and consultants

(in accordance with article 13 of European Regulation n. 679/2016)

The CIMA Foundation (hereinafter referred to as the "Foundation") provides this notice regarding the processing of personal data in accordance with European Data Protection Regulation No. 679/2016 ("GDPR"). Personal data will be processed for the purpose of carrying **out preliminary activities and managing the contractual relationship with collaborators and consultants** (including contracts for occasional self-employment, collaboration agreements—whether coordinated and continuous—or consultancy contracts and similar agreements). Additionally, data will be processed to fulfill any other obligations arising from the contract, in compliance with applicable regulations and with the adoption of appropriate security measures to protect the rights and freedoms of data subjects.

Data Controller

The Data Controller is CIMA Foundation, located at Via Armando Magliotto 2 - 17100 Savona, Italy. The contact details are as follows:

- e-mail: info@cimafoundation.org,
- PEC: cimafoundation@pec.it.

Data Protection Officer (DPO)

The Foundation has appointed a Data Protection Officer to support the Data Controller in applying national and European data protection regulations. The Officer also cooperates with the Supervisory Authority and serves as a point of contact for data subjects.

The Data Protection Officer can be reached at dpo@cimafoundation.org.

Personal data processed

The Foundation may process the following types of personal data:

- Personal information (e.g., name, surname, residential address, place and date of birth),
- Contact details (e.g., email address, phone number),
- Identification documents (e.g., ID card, passport),
- Employment details (e.g., job title, level, position, and workplace).

Purpose and legal basis of personal data processing

Personal data are collected and processed for the following purposes:

- a) Managing the selection process and evaluating candidates' qualifications and professional experience;
- b) Executing, managing, and terminating the employment relationship, including all related obligations arising from the contract (e.g., salary processing, complementary and ancillary operations, training management, and personnel transfers);
- c) Complying with legal obligations under national laws (e.g., Legislative Decree 33/2013, Legislative Decree 81/2008), EU regulations, or official orders from authorities;

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- d) Establishing, exercising, or defending the Foundation's rights or legitimate interests in legal proceedings and preventing illegal, fraudulent, or irregular activities;
- e) Archiving, conducting historical research, and performing statistical analyses, in line with the Foundation's activities.

The legal basis for processing personal data for purposes (a) and (b) is the necessity of executing a contract to which the data subject is a party, as well as carrying out pre-contractual measures at the data subject's request, in accordance with Article 6(1)(b) of the GDPR.

The legal basis for processing personal data for purpose (c) is compliance with a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of the GDPR. Specifically, these legal obligations arise from various provisions, including but not limited to Legislative Decree 33/2013 (Article 15), which requires the publication of the collaborator's CV and details of their collaboration or consultancy assignment on the Foundation's website, Legislative Decree 81/2008, which regulates the worker's suitability for assigned duties, Relevant CCNL (National Collective Labor Agreements), where applicable, The Civil Code (Articles 2222 et seq.) and Regulations related to accounting and tax law.

For purpose (d), the legal basis for processing is the necessity of defending and protecting the Data Controller's rights in legal proceedings. This processing is based on the legitimate interest of the Data Controller, in accordance with Article 6(1)(f) of the GDPR.

For purpose (e), processing is also justified by the legitimate interest of the Data Controller, pursuant to Article 6(1)(f) of the GDPR.

Nature of the data processing

The provision of personal data is necessary in order to be able to execute the performance of contractual and contractual measures. Therefore, any refusal to provide the mandatory data will result in the objective impossibility to execute the performance.

Method of Processing

The Data Controller commits to processing personal data lawfully, fairly, and transparently, ensuring that only the data necessary to achieve the essential purposes outlined in the section "Purpose and Legal Basis of Processing" is processed. Processing is carried out using both digital and paper-based methods.

Categories of recipients

The Data Controller may disclose the personal data collected, in accordance with the processing purposes and the legal bases outlined above, to third parties belonging to the following categories:

- **Law enforcement agencies, competent authorities, and ordinary or administrative courts**, which will act as independent Data Controllers;
- **Legal professionals and consulting firms** that provide, for example, legal support and advisory services. Depending on the circumstances, these entities may act either as independent Data Controllers or as Data Processors under a specific data processing agreement pursuant to Article 28 of the GDPR.

Personal data may also be disclosed to entities when required by law, regulation, or European legislation, or to comply with a judicial order. Additionally, data may be shared with other third

parties in cases permitted under national and European regulations, particularly when necessary to protect the CIMA Foundation's interests in legal proceedings, in compliance with applicable data protection laws.

Data transfer abroad

The Controller may not transfer personal data to Entities or Companies residing in third countries outside the European Union unless:

- the transfer is necessary for the performance of the contract with the person concerned;
- the transfer of data is made to a third country covered by an adequacy decision of the European Commission under Article 45 of the GDPR.

In the absence of an adequacy decision, the Data Controller undertakes, in compliance with Chapter V of the GDPR - Transfer of Personal Data to Third Countries or International Organizations - to adopt, by way of example but not limited to, the following transfer mechanisms:

- contractual agreements with the company receiving the personal data, for example using the Standard Contractual Clauses approved by the European Commission, after completion of personal data transfer impact assessment (so called "DTIA") in accordance with the EDPB Guidelines 01/2020 on Additional Measures for Data Transfers;
- compliance with a Code of Conduct or Certification mechanism, together with the recipient's obtaining binding and enforceable commitments to apply appropriate safeguards to protect transferred data;
- finally, if a transfer of personal data to a third country that is not subject to an adequacy decision is contemplated and appropriate safeguards are lacking, a transfer may be made based on a number of exceptions for specific situations, such as when an individual has explicitly consented to the proposed transfer after receiving all necessary information about the risks associated with the transfer.

Automated Decision-Making

The Data Controller does not use any form of automated decision-making that involves the data subject's personal data.

Data retention

The Foundation collects, processes, and stores data in both digital and paper formats for compilation, production, printing, and archiving purposes.

The Foundation has established the following retention periods based on the corresponding purposes:

- Personal data processed for purpose (a) will be retained for 24 months after the conclusion of the selection process;
- Personal data processed for purposes (b) and (c) will be retained for the duration of the employment relationship and for 10 years after its termination, in accordance with Article 2220 of the Civil Code;
- Personal data processed for purpose (d) will be retained for as long as necessary to protect the Data Controller's interests in legal proceedings;

- Personal data processed for purpose (e) will be retained for as long as necessary to conduct analyses and research (in anonymized or aggregated form) related to completed project activities, as well as for statistical and internal reporting purposes.

Rights of data subject

At any time, the data subject may exercise the rights outlined below, in accordance with EU Regulation 679/2016 and applicable national laws:

- **Right of Access** – The data subject has the right to confirm whether their personal data is being processed and, if so, to access that data. At any time, they may request details regarding the purposes of processing, the categories of data processed, the recipients of the data, the retention period, their rights, the data's origin, and whether an automated process is involved;
- **Right to Rectification** – The data subject has the right to request the correction of inaccurate personal data without undue delay. Additionally, they may request the completion of incomplete data, including through a supplementary statement. In such cases, the data controller must inform all recipients who have received the data of the rectification;
- **Right to Erasure** ("Right to Be Forgotten") – The data subject has the right to request the deletion of their personal data without undue delay. If the data has been made public, the data controller must erase it and take reasonable steps, including technical measures, to inform other controllers processing the data of the request to delete any copies;
- **Right to Restrict Processing** – The data subject may request the restriction of processing if they deem it necessary, limiting further processing of their data. If such a restriction is applied, the data controller must inform all recipients of the data, unless this is impossible or requires disproportionate effort;
- **Right to Lodge a Complaint with the Supervisory Authority** – If the data subject believes their data has been processed unlawfully or in violation of data protection rules and principles, they have the right to file a complaint with the Supervisory Authority (Garante per la Protezione dei Dati Personali), following the procedures established by the authority.