

# M A R N I

## INFORMATION NOTICE REGARDING THE PROCESSING OF CANDIDATES' PERSONAL DATA IN ACCORDANCE WITH ARTT. 13 AND 14 OF EU REGULATION 2016/679 ("GDPR")

### 1. INTRODUCTION

We inform you that your personal data (hereinafter, the "Data"), will be processed by **Marni Retail UK Limited**, (hereinafter, the "Company"), in compliance with the legislative and contractual provisions applicable during your relationship with or in favour of the Company and the relevant confidentiality obligations.

This Privacy Notice (hereinafter, the "Notice") contains the information required by art. 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter, "GDPR").

### 2. CONTACT DETAILS

**DATA CONTROLLER:** Marni Retail UK Limited, 29/30 Fitzroy Square W1T 6LQ London, Tel. no. +44 2074919966, E-mail address [hr\\_dataprivacy@otb.net](mailto:hr_dataprivacy@otb.net) ("Company").

### 3. CATEGORIES OF PERSONAL DATA PROCESSED AND DATA SOURCE

By way of example but not limited to: forename, surname, date and place of birth, residence, e-mail address and telephone numbers, qualifications, work experience and any other information in CVs and/or forms completed during interview and application phases. Data regarding, by way of example but not limited to, health (such as belonging to categories with protected characteristics) that may be contained in CVs or other documentation sent to the Company.

The Data can be collected directly from the data subject (therefore, directly provided by you) and/or from head hunting companies or companies that provide recruiting services, etc.

### 4. DATA PROCESSING PURPOSES, LEGAL BASIS FOR PROCESSING DATA AND DATA RETENTION PERIOD

Data will be processed for the following purposes

- a. Purposes connected to or instrumental in sourcing and selecting candidates.  
Legal basis: implementation of pre-contractual measures adopted on candidate request.  
Data retention period: Data will be retained by the Data Controller for 12 months so that your CV can also be taken into consideration for any future selections. By submitting the Data to the Data Controller, you have the possibility both to apply for a specific position and to submit a "spontaneous" application to any position opened by the Data Controller. Your application may be taken into consideration by the Data Controller for any professional opportunities available that we consider best match your skills and experience.  
In the case of your refusal expressed for storage for the period indicated above, to be exercised as described in the DATA SUBJECT'S RIGHTS section, your Data will be processed exclusively for the selection in progress and subsequently cancelled.
- b. Purposes connected to verify, through specialist companies as well, that the information provided is true based on publicly available information (including professional social network profiles, databases, web logs or multimedia archives accessible to the public). In accordance with WP29 Opinion on Data Processing at Work, processing is limited to information relating to professional position at work, in order to assess specific risks relating to candidate work activities only, in as unobtrusive a manner as possible, by adopting any necessary measures to ensure balance between the legitimate interests of employers as data controllers, and their rights and fundamental freedoms.  
Legal basis: legitimate interest  
Data Retention period: Data will be retained for the duration of selection activities then deleted once these are completed.
- c. Purposes connected to comply with requirements and exercise the rights of the Company or data subject set out in applicable legislation on employment, social security and social protection, or collective contracts, in addition to regulations set by relevant authorities and supervisory bodies.  
Legal basis: Requirement to meet the Company's legal obligations in relation to "sensitive" data, as per article 9.2 letter b).  
Data retention period: The Data will be kept for the same period of time provided for the purposes connected to or instrumental in sourcing and selecting candidates (12 months).

### 5. DATA PROVISION

The provision of Data is compulsory for sourcing and selecting personnel. A refusal to provide data makes these activities impossible and means the candidate cannot be considered for the role.

### 6. DATA RECIPIENTS

The Data may be communicated to parties acting as independent data controllers or processed on behalf of the Company by parties appointed as data processors, which are Company's supplier for the purposes of selection, recruitment and assess of candidates, who are provided with suitable operating instructions.

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For purposes connected to or instrumental in sourcing and selecting candidates, the Data could be shared with other companies, as autonomous data controllers, within the group of the Company. A complete list of companies within the group of the Company is available here <https://www.otb.net/en/our-companies/>.

## **7. PARTIES AUTHORISED TO PROCESS DATA**

The Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorised to process the data and received suitable operating instructions.

## **8. PERSONAL DATA TRANSFERS OUTSIDE THE EU**

The data may be transferred to non-EU countries, in particular whose data protection level is deemed adequate by the European Commission in accordance with article 45 of the GDPR after signing standard contractual clauses adopted/approved by the European Commission in accordance with article 46, 2, letters c) and d). You can ask for information regarding this third countries using the contact details indicated in paragraph 2.

## **9. DATA SUBJECTS' RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY**

By contacting the Company via e-mail sent to the following email [hr\\_dataprivacy@otb.net](mailto:hr_dataprivacy@otb.net), data subjects can ask the controller for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing of the data in the cases set out in article 18 GDPR, and object to processing in the case of legitimate interests of the controller.

Furthermore, in the case where processing is carried out on the legal basis indicated in article 6 (1) let. B (performance of a contract or to take steps at the request of the data subject prior to entering into a contract) with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction ("portability").

Data subjects have the right to lodge a complaint to the competent Supervisory Authority.