

## **PRIVACY POLICY OF THE WEBSITE Inno Next**

This page describes how the site is managed with regard to the processing of personal data of users who consult it, as well as how and for what purpose personal data is processed.

This information is provided pursuant to Articles 13-14 of Regulation (EU) 2016/679 - hereinafter, GDPR - to those who interact with web services accessible by electronic means from the address: <https://innonext-project.eu/>

This site is the property of **Réseau Entreprendre® Piemonte** which manages and maintains this site with the purpose of providing information and communications concerning the services offered from the Inno Next site.

This information is provided only for the website in question and not for any other websites that may be consulted through our links, of **which Réseau Entreprendre® Piemonte** is in no way responsible for.

**The association Réseau Entreprendre® Piemonte**, with registered office in Via Maria Vittoria 38 - 10123 TURIN, in its capacity of Data Controller of your personal data, pursuant to and for the purposes of EU Reg. 2016/679 - GDPR, hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

### **Holder's contact details**

The data controller can be contacted at the following addresses:

Headquarters Palazzo Rinascimenti Sociali, Via Maria Vittoria 38 - 10123 TORINO

Mail: [piedmonte@reseau-entreprendre.org](mailto:piedmonte@reseau-entreprendre.org)

### **Contact details of the Data Protection Officer (DPO)**

Mail: [jacopo.grillo@principevalgiusti.it](mailto:jacopo.grillo@principevalgiusti.it)

Pec: [jacopogrillo@pec.ordineavvocatitorino.it](mailto:jacopogrillo@pec.ordineavvocatitorino.it)

Your personal data will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations therein.

## **TYPES OF DATA PROCESSED**

### **Navigation Data**

The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. These data, which are necessary for the use of web services, are used to obtain statistical information on the use of the site (most visited pages, time spent on the site, geographical area of origin, most frequented times, etc.), to check its correct functioning and are deleted immediately after processing, except in the case of any need to ascertain crimes by the judicial authorities.

### **Data collected by the website**

In relation to the services provided by the website, we would like to point out that the computer systems in charge of its operation acquire, in the course of their normal operation, certain data referring to the User, the transmission of which is mediated by explicit authorisations provided by the User at the time of activation of the specific action. During the uploading phase of the files for the creation of the user profile, specific authorisations will be requested in order to have access exclusively to the functions required by the website.

The website allows files (such as the Talent CV) to be uploaded during user registration by selecting from several submission options, including the possibility of uploading files on the device, including mobile, used for browsing. Depending on the mode chosen, the site may request extemporaneous access to:

- Image gallery;
- Storage memory;

The User can freely manage the authorisations directly on the Privacy settings of the browsing browser (e.g. Google Chrome, Firefox) or decide not to allow access on receipt of notification of authorisation request if operating from a mobile phone.

#### **Data provided voluntarily by the user**

- **CONTACT US:** The completion of the data collection form, explicitly and voluntarily, for the purpose of requests for information, entails the subsequent acquisition of the sender's address, which is necessary to respond to requests, as well as any other personal data included in the request.
- **NEWSLETTER:** subscribing to our newsletter, for the purpose of sending informative material, entails the subsequent acquisition of your email address, as well as all data necessary for the pursuit of this purpose.
- **CALL FOR APPLICATION:** applying on our portal using the appropriate form will entail our acquiring all the information contained in your curriculum vitae in order to proceed with application management and the creation of your personal area on the site. These data, communicated at the time of application, include personal data (name, surname, gender, date of birth), contact details (e-mail, telephone number, residence), a password for access to the personal area, and data relating to work and academic experience. Your special data (such as health status and racial and ethnic origin), will only be processed if relevant and necessary for the pursuit of the aforementioned purposes, otherwise they will not be taken into account (Provision of the Supervisory Authority for the Protection of Personal Data, containing the prescriptions concerning the processing of special categories of data, pursuant to Art. 21, paragraph 1 of Legislative Decree No. 101 of 10 August 2018).
- **HOSTING COMPANY APPLICATION:** applying on our portal by means of the "IFrame" form will entail the acquisition by us of all the information contained in the form. The information acquired is mainly related to the applying Hosting Company, but data such as the name and surname of the contact person, e-mail and telephone number will be collected, which may involve the processing of simple personal data of the compiler.

Specific summary information is given or displayed on the pages of the site set up for particular services on request.

#### **MODE OF TREATMENT**

The data are processed mainly by electronic and computerised means and stored on computer media, in compliance with the modalities set out in Articles 6, 32 of the GDPR and through the adoption of appropriate security measures to prevent loss of data, unlawful or incorrect use and unauthorised access.

The data controller relies on the technical and design partner Zucchetti spa exclusively for the use of Inrecruiting, an ATS (Applicant Tracking System) software application that helps manage personnel recruitment and hiring processes, . In addition, the Owner relies on the design and technical partner LINKS exclusively for its support in the development of the AI system algorithm, called Inda, to help recruiters in the process of pre-screening candidates for vacancies and open applications from host companies. The AI system

is integrated with Inrecruitinge necessary to conduct the matching of Talents and Host Companies with more consistency, fairness and to guarantee a fair and non-discriminatory selection.

In compliance with Art. 5 par. 1 section a) of the GDPR on the transparency of data processing, the Data Controller informs you that the data entered and sent by individuals for applications may also be processed by means of automated non-decision-making processes based on AI and will be subject to profiling. Specifically, the decision-making process involves only the pre-screening phase, and in detail performs the functions of:

1. CV Parsing: simplifies the recognition and extraction of data from CVs provided by candidates to speed up the indexing of information;
2. Semantic search: enables targeted searches on submitted CVs based on keywords entered in the search by the holder's authorised personnel;
3. Candidate scoring: enables the dynamic ranking of candidate profiles against a specific search carried out by authorised personnel. The scoring process is configured in such a way that it disregards, and therefore disregards, any personal data such as age, gender and nationality as a greater guarantee of fairness in the subsequent selection process.

Candidate scoring is an automated process based on data profiling. Profiles are generated from curricula provided by users, or from information entered by interested parties in the forms to be filled in during registration, considering professional skills, course of studies, certifications and certificates in specific subjects and/or courses of study. Profiling categories include completed academic courses and certifications, professional skills and certifications, career path, age group, state or region of residence, and language skills. This tool is useful to provide an initial phase of collecting and indexing the profiles received to help matching Talents - Hosting Companies. Inda, in the search and selection process, helps to carry out a more objective assessment of candidates by working exclusively on the person's skills, qualifications and professional experience. The process prescind personal information such as gender, nationality, age and even any photos on the CV, providing the evaluator and selector with virtually anonymised copies of CVs to ensure greater fairness and equality in matching. These processes are limited to assisting the selection of profiles carried out by persons specifically appointed by the Owner.

Data provided by the applicant or the contact person of the Hosting Company will not be used for AI training unless explicit consent is given.

We inform you that, in order to provide a complete service, our portal may contain links to other websites, not managed by us. We are not responsible for errors, content, cookies, publication of unlawful moral content, advertising, banners or files that do not comply with the regulations in force and for compliance with the Privacy Law by sites managed by us to which reference is made. In order to improve the service offered, we would appreciate it if you would immediately report any malfunctions, abuses or suggestions to the following e-mail address: [piemonte@reseau-entreprendre.org](mailto:piemonte@reseau-entreprendre.org)

Your data will only be processed by staff expressly authorised by the Data Controller or by partners specifically appointed for this purpose as data processors.

## **PURPOSE OF PROCESSING AND LEGAL BASIS**

The data will be processed for the following purposes:

1. Site registration and participation in Internship programmes as a Talent and as a Hosting Company. The legal basis of the processing is the consent of the data subject, pursuant to Art. 6, par. 1, lett. a) of the Regulation. The provision of data for this purpose is optional, but failure to provide it would make it impossible to create a reserved area on the site and participate in the European internship programmes offered;
2. Candidate profiling: in order to optimise and make the matching activities fairer, the data entered directly by the person concerned via the form or personal area will be profiled for the sole purpose of categorising and making the search for talent more pertinent on the basis of the internship offers proposed by the

companies registered on the site as Hosting Companies. The categories applied concern academic background, qualifications obtained, certifications, professional experience and sectors of interest and others related to the sphere of work/academic interest. The legal basis for the processing is consent pursuant to Art. 6(1)(a) of the Regulation. The provision of data for this purpose is optional, but failure to provide it would make it impossible to participate in the selection processes for the European internship programmes offered.

3. AI training developed on Inda framework. The legal basis for data processing is the consent of the data subject, pursuant to Art. 6(1)(a) of the Regulation. The provision of simple personal data for this purpose is optional, and failure to give consent does not affect the normal activity on the platform.
4. Newsletter activities. The legal basis for the processing is the consent given by the data subject when subscribing to the site's newsletter service, art.6, par 1, lett. a) of the Regulation. Limited to the occurrence of lawsuits and subpoenas, the protection of the Data Controller in court. For this purpose, the processing is necessary for the pursuit of the legitimate interest of the Owner pursuant to Art. 6, par. 1, lett. f) of the Regulation;

### **SUBJECTS TO WHOM PERSONAL DATA MAY BE DISCLOSED**

Personal data relating to the processing in question may be communicated to Hosting Companies at the end of the matching process in order to follow up on the service requested by the person applying for the Internship programmes. Your data may only be communicated to competent and duly appointed persons for the performance of the services necessary for the proper management, including technical management, of the platform, in compliance with the principles of minimisation and lawfulness of processing. Furthermore, some data (such as, by way of example: IP addresses, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, etc.) may be communicated and disseminated to the internet operators that Réseau Entreprendre® Piemonte uses to manage its domains.

Your personal data will not be disseminated in any way.

### **DATA RETENTION PERIOD**

We would like to inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, in accordance with Art. 5 of the GDPR, the storage period of your personal data is set for a period necessary for the performance of the requested services and in compliance with the regulations in force regarding the storage of fiscal, tax and contractual documents.

Specifically, the personal data of registered users, both Talent and Host, i.e. CVs, will be stored for a period of time equal to 24 months from the last activity performed by the user profile or until the data subject's request for deletion of the profile. After this period has elapsed, a due communication will be sent to the person concerned informing him/her of the imminent deletion of his/her profile and personal data relating to him/her if he/she does not renew his/her wish to keep the profile active.

### **RIGHTS OF THE INTERESTED PARTIES**

1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning him/her, even if not yet recorded, and its communication in intelligible form.
2. The person concerned has the right to be informed:
  - a. the origin of personal data;
  - b. the purposes and modalities of the processing;
  - c. the logic applied in the event of processing carried out with the aid of electronic instruments;
  - d. the identification details of the holder, the persons responsible and the representative designated pursuant to Article 5(2);
  - e. of the entities or categories of entity to whom or which the personal data may be communicated or who or which may become aware of them in their capacity as designated representative(s) in the territory of the State, data processor(s) or person(s) in charge of processing.

3. The data subject has the right to obtain:
  - a. updating, rectification or, when interested, integration of the data;
  - b. the cancellation, transformation into anonymous form or blocking of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
  - c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
  - d. data portability.
4. The data subject has the right to object, in whole or in part:
  - a. for legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of collection;
  - b. the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.
5. The data subject has the right to request the restriction of processing.

You may exercise your rights by sending an e-mail to [piemonte@reseau-entreprendre.org](mailto:piemonte@reseau-entreprendre.org) or by sending a written request to the above-mentioned addresses.

In addition, the data subject in the event that he or she considers that the processing of his or her data is contrary to the legislation in force may lodge a complaint with the Data Protection Supervisory Authority pursuant to Article 77 of Regulation 2016/679 or file a report pursuant to Article 144 of Legislative Decree 101/2018.

#### **ANTISPAM SERVICE - RECAPTCHA**

In certain sections of the website, i.e. on data collection forms, we have implemented the Google reCaptcha anti-spam service provided by Google Inc.

Captcha is a type of security measure, known as Challenge/Response authentication, that analyses website traffic, processing the user's personal data, in order to protect the site owner, the site itself and users from spam, software bots, worms, spam bots, brute force attacks and password decryption by asking them to pass a simple test that proves that the user is a person and not a computer attempting to hack a password-protected account.

#### **INTERACTIONS WITH SOCIAL NETWORKS**

The site allows interactions with social networks through hyperlinks, the same interactions are subject to privacy requirements, managed by the subject directly on the pages of the social networks. With regard to the processing of personal data carried out by the managers of the social media platforms used by the Owner, please refer to the information provided by them through their respective privacy policies. **Réseau Entreprendre® Piemonte** processes the personal data provided by users through the pages of the Social Media platforms dedicated to the latter, exclusively for the purpose of managing interactions with users (comments, public posts, etc.) and in compliance with the regulations in force.

Below, for the sake of completeness and convenience, we provide links to the policies of the social media platforms used by the owner and referred to via links on the site:

##### **Instagram**

The Instagram link is a social networking interaction service provided by Meta Platforms, Inc. Read more about the privacy policy of Meta Platforms, Inc. - Privacy Policy <https://help.instagram.com/519522125107875>

##### **X (formerly Twitter)**

The Twitter link is an interaction service with the social network, provided by Twitter, Inc.

Read more about the privacy policy of Twitter, Inc. - Privacy Policy <https://twitter.com/it/privacy>

**LinkedIn**

The LinkedIn link is a service for interaction with the social network, provided by LinkedIn Corporation.

Read more about LinkedIn's privacy policy - Privacy Policy [https://www.linkedin.com/legal/privacy-policy?\\_l=it\\_IT](https://www.linkedin.com/legal/privacy-policy?_l=it_IT)