



ESTABLISHED 1962

ASM | AMERICAN
SCHOOL
OF MILAN

JOB APPLICANT PRIVACY NOTICE

This Privacy Notice tells you how **American School of Milan** ("**ASM**", "**we**" or "**us**"), in the capacity of **Data Controller**, processes your personal data.

1. CATEGORIES OF PERSONAL DATA, PURPOSES AND LEGAL BASIS OF THE PROCESSING

We process the following types of personal data when you apply for a position with us.

- **Data you provide to us:** We collect and store any data you provide us through your application, including your contact details; your application materials (CV, cover letter, previous work experience, education, and transcripts, and our notes from any interviews with you); your desired salary, type of employment sought and date available; your identification documents (passport number, government identification numbers where permitted, immigration status); and any other data you submit to us, including any correspondences you may have with us during the application process.
- **Data from other sources:** We obtain data about you from other sources, including recruiters, employment research firms, identity verification services, the references you provide to us, websites and other publicly accessible data on the Internet. We may also receive data you submit to us through third-party websites.

We collect, use and store your personal data for the reasons set out below.

- **Where this is necessary for ASM to review and assess your application for employment.**
 - This includes assessing your skills and interest in career opportunities at ASM, processing your application, analyzing your qualifications, verifying your identity and your eligibility for employment, and communicating with you about your application to respond to your inquiries and schedule interviews.

2. PROCESSING METHODS AND NATURE OF DATA PROVISION

We will process your personal data using IT systems and paper files according to the principles of fairness, integrity and transparency, by protecting the confidentiality of your personal data by adopting suitable technical and organisational measures to guarantee a level of security adequate to the risk.

If you decide to apply, you will be free to provide the personal data you consider most suitable for this purpose. However, in case of failure to provide personal data necessary for the purposes of your identification (such as, for example, personal data or your training) or personal data specifically requested by ASM (during the interview or by email) ASM may not be able to fully evaluate your application and complete the personnel selection procedure.

3. DATA RETENTION

We will retain your personal data only for 1 year from the closing of the application process or as long as we need it in accordance with applicable law, unless you give us permission to hold your records on file for other positions that become available. If you accept employment with us, we will retain your personal data throughout your employment in accordance with a separate notice we provide to you upon your acceptance of employment.

4. RECIPIENTS OF YOUR PERSONAL DATA

Our Personnel - For the purposes above, your data may be accessed on a need-to-know basis and used mainly by our authorised personnel, including the ASM Leadership Team and the Human Resources.

Our Data Processors - For the purposes indicated above ASM uses third parties for the provision of some services that involve the processing of your personal data, including some suppliers of IT services.

Those entities operate on the basis of specific and adequate instructions on how to process the data and to protect them, as described in *ad hoc* data processing agreements. The full and updated list of entities that process personal data in the capacity of data processors is available upon request from the Data Protection Officer.

5. DATA TRANSFER OUTSIDE EEA

Your personal data is mainly stored in Italy or in the European Economic Area, but some data can be processed and managed by third parties services suppliers that are based in countries outside the EEA. In this case we implement the mechanisms provided by the GDPR (for example the implementation of standard contractual clauses approved by the European Commission according to GDPR) in order to ensure that your data is processed according to European data protection legislation standards. For further information, please contact the Data Protection Officer, by writing an email to dpo@asmilan.org.

6. YOUR DATA PROTECTION RIGHTS

You, as a data subject, can exercise, in relation to the data processing described therein, the rights provided by the Regulation (Articles 15-21), including the right to:

- receive confirmation of the existence of your personal data, access its content and obtain a copy (**rights of access**);
- update, rectify and/or correct your personal data (**right to rectification**);
- request the erasure or restriction of the processing of those data processed in violation of the law and those whose storage is not necessary in relation to the purposes for which the data was collected or otherwise processed (**right to erasure and right to restriction**);

- receive a copy of personal data provided in a structured, commonly used and machine-readable format (e.g. data relating to salaries, internal mobility services) and request that that personal data are sent to another data controller (**right to data portability**);
- refuse consent or withdraw consent, where provided, without detriment nor prejudice to the lawfulness of the processing based upon the consent provided before the revocation.

You also have the right to object to the processing of your data by us in some circumstances set forth by the Regulation (**right to object**).

To exercise the above rights, you may contact ASM or the Data Protection Officer at the contact details indicated below.

You also have the right to make a complaint to the Data Protection Supervisory Authority or to seek a remedy through the courts if you believe that your rights have been breached.

8. IDENTITY AND CONTACT DETAILS OF DATA CONTROLLER AND THE DATA PROTECTION OFFICER

The Data Controller is American School of Milan, with registered office in Via Karl Marx 14, Noverasco di Opera (MI), in the person of its acting Legal Representative, email address privacy@asmilan.org, phone number 025300001.

The DATA PROTECTION OFFICER is available at the email address dpo@asmilan.org.

Noverasco di Opera, May 2nd 2019