

*The following template of the Description of the File / Register Description has been drafted by a legal office based in Helsinki for the IRC Global Executive Search Partners Association registered in Finland to meet requirements of the EU General Data Protection Regulation. A new file is available on the Privacy Policy page on the [IRC global website](#). IRC Members are welcome to adopt the template for their local use (data highlighted in yellow needs to be completed). A consultation with your local lawyer is strongly recommended to reflect local legislative requirements.*

## **DESCRIPTION OF THE FILE / REGISTER DESCRIPTION**

### **1. CONTROLLER:**

Open Srl  
Via A. M. Grancini, 4  
20145, Milano (Italy)  
Tel. +39 02.48029441

### **2. PERSON IN CHARGE AND/OR CONTACT PERSON:**

Giuliana Nurzia  
Via A. M. Grancini, 4  
20145, Milano (Italy)  
Tel. +39 02.48029441  
Email: [giuliana.nurzia@open-executive.com](mailto:giuliana.nurzia@open-executive.com)

### **3. NAME OF THE DATA FILE:**

Archivio Comune

### **4. PURPOSE OF PROCESSING / LEGAL BASIS:**

Personal data is processed for the purposes of keeping a data file of persons who have submitted their resume to [Open Srl ] for recruitment purposes.

The processing is based on the data subject's consent. The data subject has the right to withdraw his/her consent at any time by informing the controller of the withdrawal.

### **5. CONTENT OF THE DATA FILE:**

The following personal data related to the applicant is processed:

- Name
- E-mail
- Phone number
- Current location (country)
- The applicant's location preferences
- Current position level
- Major profession
- Industry
- Language skills

### **6. PERIOD FOR WHICH THE DATA WILL BE STORED**

The data will be stored for 36 months from the date of submitting.

#### 7. REGULAR SOURCES OF INFORMATION:

Personal data is obtained directly from the applicant on the website <http://www.open-executive.com>

#### 8. REGULAR DESTINATIONS OF DISCLOSED DATA / TRANSFER OF DATA:

The Resume database operates on the Internet and recorded data are restricted to be used solely by the controller. Data is not disclosed or transferred to third parties without the consent of the applicant.

#### 9. PRINCIPLES IN ACCORDANCE TO WHICH THE DATA HAS BEEN SECURED:

The controller has carried out the technical and organizational measures necessary for securing personal data against unauthorised access, accidental or unlawful destruction, manipulation, disclosure and transfer and other unlawful processing.

#### 10. RIGHT OF ACCESS:

The data subject has the right to check what personal data is stored on his/her personal data file and to receive a copy of such data. The inspection request should be sent to the contact person above, and should be in writing and signed.

#### 11. RIGHT TO DEMAND RECTIFICATION AND ERASURE OF DATA OR RESTRICTION OF PROCESSING:

The data subject has the right to request the rectification of inaccurate or completion of incomplete personal data by contacting the controller. If the controller refuses the request of the person concerned of the rectification of an error, a written certificate to this effect shall be issued. The certificate shall also mention the reasons for the refusal. In this event, the data subject may bring the matter to the attention of the Data Protection Ombudsman.

The data subject has also the right to require erasure of personal data and the controller is obligated to erase the data if the personal data is no longer necessary in relations to the purposes for which they were collected, if the data subject withdraws his/her consent for the data processing, if the data subject objects to the processing or if the personal data have been unlawfully processed.

Instead of requesting erasure the data subject can also request a restriction of the processing of personal data. Restriction can be requested i.e. in case the personal data is inaccurate, or unlawful, or pending a decision on a complaint lodged by the data subject.

#### 12. RIGHT TO DATA PORTABILITY

By a written request to the controller the data subject has the right to receive the personal data concerning him or her, which he or she has provided to the controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.

#### 13. RIGHT TO LODGE A COMPLAINT

The data subject shall have a right to lodge a complaint with the supervisory authority of the EU members state of his/her habitual residence.