

Privacy Policy 'Personnel Selection'



1. Data Controller

STEMIN S.p.A., with registered offices at Via Guglielmo Marconi, 67 24040 – Comun Nuovo (BG), Tax ID Code and VAT reg. no. 02681790164, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



2. Data processed, purposes and legal grounds for processing

Processing of personal data takes place within the personnel selection process aimed at identifying individuals to be included in the Data Controller's staff and assessing whether they meet the company's needs, in order to proceed with the possible signing of the employment contract.

For the management needs of the personnel evaluation and selection process, the following categories of data may be processed:

- a) personal data, general information, address and other contact details, tax code, education, specializations, work experiences, and any other information necessary for the personnel evaluation and selection process (curriculum vitae, cover letter);
- b) (if any) data suitable for detecting health status, collected in reference to belonging to protected categories and/or fitness for performing certain tasks for which health surveillance is required, and the Data Controller provides for a pre-employment medical examination.

It is recommended, in this regard, to communicate or include in the curriculum vitae only information relevant to the selection purpose; in particular, please limit health-related information to what is strictly necessary to inform the potential employer of belonging to protected categories.

The legal bases that legitimize the processing are:

- with reference to point a), the execution of pre-contractual measures related to the selection process of which the data subject is a part (Art. 6.1 letter b);

Sede Legale e Amm e Unità Produttiva

Via Marconi, 67
24040 Comun Nuovo (BG) - Italy
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Unità Produttiva

Via Marconi, 41
24040 Comun Nuovo (BG) - Italy
T. +39 035 595774 - F. +39 035 334413

Unità Locale

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24040 Ciserano (BG) - Italy
T. +39 035 4820699 - F. +39 035 4810300



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ISO 9001 **SGQ N°044MS:2116817**
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- with reference to point b), the consent of the data subject both in the case where health data are present in the curriculum vitae and in the case where, for the job position being selected, the Data Controller provides for a pre-employment medical examination (Art. 6.1 letter a).



3. Nature of provision

Providing data is optional; however, any refusal to provide it in whole or in part will result in the Interested Party being unable to participate in the personnel selection process conducted by the Data Controller.

The provision and related consent may be collected indirectly through companies linked to Radiatori2000 SpA by corporate participation relationships (so-called 'FECS Group').

It is emphasized that the interested party always has the right to exercise the rights indicated in the following point 7.



4. Processing locations and methods and data retention times

The data collected from the website are processed at the Controller's headquarters.

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

Data are retained for the time strictly necessary to the purpose for which they were processed ("storage limitation principle", Art.5, EU Regulation 2016/679), or in compliance with the expiry set out in current standards or obligations set down by law.

Checks of the obsolescence of data stored in line with the purposes for which they were collected will be made regularly.

In any case, the Data Controller implements rules that prevent permanent data retention and therefore, limits the retention time according to the principle of minimizing data processing.

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5. Authorised subjects, data processors and data communication

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of the purposes itself, may be processed by third parties appointed by external Processors, i.e., according to cases, communicated to those subjects necessary for the correct completion of the aims set out in point 2.

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



6. Data transfer to non-EU countries

The collected data will not be subject to transfer abroad.



7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- a. (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- b. (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- c. (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- d. (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion ("right to be forgotten");
- e. (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- f. (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

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The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to info@steminspa.it and specifying the content of their request in the subject line. Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

Latest update: 12nd June 2025

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