

## PRIVACY STATEMENT PURSUANT TO ART. 13 OF EU GENERAL DATA PROTECTION REGULATION 2016/679 (GDPR)

Istituto Mediterraneo per i Trapianti e Terapie ad Alta Specializzazione ("ISMETT") provides state-of-the-art medical services thanks to the collaboration with the UPMC Group in Pittsburgh, U.S.A.. In order to ensure a close collaboration with these top international facilities, ISMETT's management was entrusted to UPMC Italy ("UPMCI"), the Italian subsidiary of the UPMC Group.

Pursuant to art. 13, EU Regulation 2016/679 ("**Regulation**"), ISMETT and UPMCI, in their capacity of joint controllers, provide you with the following information.

Personal data included in your CV and any other information obtained during the selection (e.g., certifications, documents, and candidate application form), including the online form available at <https://selezioni.ismett.edu/?lang=it>, will be processed for the sole purpose of assessing your possible collaboration with, or hiring by ISMETT or UPMCI, depending on which of the two companies will act as employer or on the subject with whom the working relationship will start. Data will be processed using electronic tools and hard copy forms with appropriate modalities that guarantee its security and confidentiality, thus complying with the provisions of the Regulation. The legal basis of your data processing is described in art. 6.1(b) of the Regulation ("*Performance of a contract to which the data subject is party*").

The conferment of your data is mandatory to evaluate your application. Failure to provide this data can preclude this evaluation. We ask you enter in your CV only data necessary to assess your professional profile, restraining from including any information defined by the Regulation as "special categories of personal data" (e.g., information on your state of health, political opinions, trade union membership), which requires your explicit consent as legal basis for their processing (art. 9.2-a of the Regulation, "*Consent of the data subject to the processing*"). Therefore, should you require it is necessary to provide special categories of personal data concerning yourself, please tick the appropriate box below. Should no consent be given, the special data entered spontaneously in the CV will be stored in accordance with the law only to preserve the integrity of the document containing the data, but will not be used for further purposes.

If you are included in a "protected category" and wanting to avail yourself of the benefits under Law 68/99, it is not necessary to obtain consent as the processing is carried out according to art. 6.1(b) of the GDPR ("*Performance of a contract to which the data subject is party*") in connection with art. 9.2(b) of the GDPR ("*processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the data subject in the field of employment*").

Should you decide to not provide your consent to the processing of these data, you may submit your application without stating your inclusion in a protected category, or any other special category of data. Should you decide to spontaneously enter special data in the CV, these will be stored in accordance with the law only to preserve the integrity of the document containing the data, but will not be used by the data controller for further purposes.

In the event of an unsolicited job application, your personal data will be stored for a maximum of 5 years from the date of receipt of your CV or of its latest update. In case of participation in a selection, the documentation (e.g. CV, assessment forms, tests, candidate forms) will be stored for a period of 5 years from the closing date of the selection, for participation in other selections, and for 10 years for any protection in court of the rights of UPMCI (in this case, the legal basis of the processing is provided by art. 6.1(b) ("*processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract*") and, as regards the exemption from the prohibition of processing of special data, by art. 9.2(f) of the Regulation "*processing is necessary for the establishment, exercise or defense of a right in court*". This period will start from the end of the year in which the call for application was published. Your personal data will be processed by employees and consultants of the joint controllers in charge of staff recruitment, acting in compliance with specific instructions on objects and purposes of the data processing. Your data may also be shared with third parties appointed data processors (e.g., staffing agencies) and providing ancillary or instrumental services to the joint controllers' operations, or to other companies of the UPMC Group (the legal basis of the processing is art. 6.1(f) of the Regulation "*Legitimate interests pursued by the controller*"). Due to the collaboration with the UPMC Group in Pittsburgh (U.S.A.), we inform you that your data may be transferred to the United States of America. Due to the fact that legislation in the U.S.A. does not guarantee, according to EU regulations, an adequate level of personal data protection, by signing the [Standard Contractual Clauses approved by the European Commission](#), the UPMC Group commits to enforce safety measures to protect transferred personal data. A copy of these contractual clauses can be obtained contacting the DPO at the addresses indicated below. Collected data will under no circumstance be disclosed.

Joint controllers are Istituto Mediterraneo per i Trapianti e Terapie ad Alta Specializzazione and UPMC Italy, both with registered office in Discesa dei Giudici 4, 90133, Palermo, Italy.

You may contact ISMETT's DPO at the following addresses: ISMETT S.r.l. - Responsabile della Protezione dei Dati, Discesa dei Giudici 4, 90133 Palermo, Italy; [dataprotectionofficer@ismett.edu](mailto:dataprotectionofficer@ismett.edu).

In your role of data subject you have the right to obtain from the joint controllers authorization to access, rectify or delete, and to limit or deny the processing of your personal data ([art. 15 et seq., Regulation](#)). Where processing is carried out on the basis of your consent, you may decide to withdraw it at any time. These rights can be exercised with a request to the DPO at ISMETT at : [dataprotectionofficer@ismett.edu](mailto:dataprotectionofficer@ismett.edu) or ISMETT S.r.l. – Discesa dei Giudici 4, 90133 Palermo, Italy, or contacting the Data controller - Office of the Director of Health Care Activities at [direzionesanitariaprivacy@ismett.edu](mailto:direzionesanitariaprivacy@ismett.edu). A template of the request is available from the Italian Data Protection Authority ("Garante") [website](#).

Should you deem your personal data has been processed in breach of the Regulation, you have the right to file a [complaint to the Italian Personal Data Protection Authority](#) (art. 77, Regulation) or to start judicial proceedings (art. 79, Regulation).

**Last update: October 2022**