

## Information pursuant to Art. 13 EU Regulation 2016/679

The personal data you provide when registering to take part in the call for applications for the formation of a list for the subsequent assignment of housing that will become available in the municipality of Genoa for social housing (hereinafter referred to as 'the List' for brevity), will be processed, including by means of computer and electronic tools, by S.P.Im. S.p.A., P. IVA 03288300100, with registered office in Genoa, Via di Francia 1, in the person of its legal representative *pro tempore* (hereinafter referred to as 'the Controller' or 'the Company' for brevity).

### Data Controller

The data controller of your personal data is S.P.Im. S.p.A., P. IVA 03288300100, with registered office in Genoa, Via di Francia 1, in the person of its legal representative *pro tempore*.

### Contact details of the Data Protection Officer

The Data Protection Officer may be contacted by writing to the e-mail address [privacy@spimgenova.it](mailto:privacy@spimgenova.it) or by writing by regular mail to the Company's head office.

### Categories of personal data

The following personal data may be subject to processing in summary but not exhaustive form:

- data for creating your account (user name and password);
- personal details;
- contact data (landline, mobile phone number and e-mail address);
- tax code;
- copy of identity document;
- citizenship data;
- declarations relating to the non-existence of administrative orders of annulment or forfeiture of the assignment or administrative or judicial orders to release the accommodation;
- data on employment status (student, PhD student, researcher, worker) and income bracket;
- data relating to the composition of the household and family status;
- data relating to your state of health and that of your family members with regard to the presence of disabilities and related levels of disability.

Following your registration, you will also be asked to fill in a subsequent form with personal data, including health data (possible degree of disability), of members of your household or other persons living with you.

In the event that the aforementioned form is used to request the personal data of persons of full age, they will be provided with specific information notice and asked for their consent. In the event that data relating to minors under your parental responsibility are requested, this information notice shall be deemed to be addressed to them as well, but to you in your capacity as the one exercising parental responsibility. It will therefore be you, in that capacity, who will be responsible for issuing the relevant consent, on their behalf, as provided for in the remainder of this notice.

With regard to the above, in this information notice the term 'personal data' shall refer indistinctly to your personal data and/or those of the child under your parental responsibility and entered by you in the relevant form.

### **Purpose of processing**

Personal data will be processed by the Controller for the following purposes:

- I. to enable you to participate in the call for applications for the formation of the List;
- II. to proceed with the formation of the List;
- III. to verify that you meet the requirements for participation in the call for applications;
- IV. to send you communications regarding the completeness and regularity of the application;
- V. to proceed with the legal obligations to which the Company is bound.

### **Legal basis**

The legal basis for the processing of personal data for the purposes set forth in points I, II, III and IV above is the adoption of pre-contractual measures (participation in the call for applications to form the List).

The legal basis for the processing of personal data for the purpose set forth in point V above is the fulfilment by the Controller of its legal obligations.

If, where required, you provide personal data defined as special (e.g. health-related data such as the degree of your or a person under your parental responsibility's disability), the legal basis for processing this category of data will be your consent.

### **Obligatory provision of personal data**

The provision of personal data is necessary in order for you to take part in the call for applications for the subsequent formation of the List. Consequently, failure to submit personal data will make it impossible for you to participate in the call for applications.

### **Parties to whom your data may be communicated**

Personal data may be disclosed to:

- Public bodies;
- The consultants used by the Company in the context of the call for applications.

Furthermore, the company in charge of the support and maintenance of the online platform that manages the formation of the List, which acts as 'Data Processor' on behalf of the Data

Controller, may have access to the personal data.

The data may also be accessed by employees of the Company, defined as data processors, if the task of such employees so requires. Each processor is specifically identified, authorised and trained, and acts on the basis of specific instructions provided by the Company as to the purposes and methods of processing and the security measures to be adopted for the protection of personal data.

### **Formation of the List**

Each of the requirements set out in the call for applications, which you will enter in the relevant forms, corresponds to a score, the arithmetic sum of which will give your application an overall score and thus your level in the List. The individual scores are given in the call for applications. The overall score is awarded automatically by an algorithm that adds up. You may, at any time, verify your place in the List by accessing your personal page where your position in relation to the other participants is shown, without each participant being able to view the name and position of the others, and thus directly verify the correctness of the score attributed to you. In addition, you may always request the human intervention of an operator of the Controller to verify the correctness of the score given by contacting the Controller at the contact details given in this notice.

### **Rectification of data**

Without prejudice to the exercise of your right to have your data rectified, as set out in the paragraph below entitled 'Exercise of Rights', you may, at any time, rectify the personal data you have entered in the forms by accessing your personal area. The system will then update your score in real time accordingly.

### **Period of data retention**

The personal data processed for the purpose of preparing the list (points I, II, III, IV and V of the purposes) will be kept for the duration of 5 years from the next, possible, phase of assigning the accommodation, in order to allow the Controller any checks in the event of appeals against the list by other participants. In the event of non-allocation of accommodation, personal data will be kept for the entire duration of the call for applications (10 years).

Personal data processed in order to allow the Controller to fulfil the legal obligations to which it is subject, will be kept for the terms established by law.

### **Exercise of your rights**

The Controller informs you that you have the right, within the limits prescribed by Regulation 2016/679, to:

- obtain data and information on the processing, in particular in relation to the type of personal data processed, the purposes for which the personal data are processed, the period of processing and the persons to whom the data are communicated (so-called **right of access**);

- obtain the rectification or integration of inaccurate personal data concerning you (so-called **right of rectification**);
- obtain the deletion of personal data concerning you in the following cases: (i) the personal data are no longer necessary for the purposes for which they were collected; (ii) you have withdrawn your consent to the processing of personal data, if they are processed on the basis of such consent; (iii) you have objected to the processing of personal data concerning you if they are not processed for a legitimate interest of the Controller; (iv) the processing of personal data does not comply with the law. However, the retention of your personal data by the Controller is lawful if it is necessary to enable the Controller to comply with a legal obligation or to establish, exercise or defend a right in a court of law (the so-called **right of deletion**);
- have personal data concerning you only retained without any other use of them in the following cases: (i) you contest the accuracy of the personal data, for the period necessary to allow the Controller to verify the accuracy of such personal data; (ii) the processing of the personal data is unlawful and you object, however, to the deletion of the personal data by the Controller (iii) the personal data are necessary for the establishment, exercise or defence of legal claims; (iv) you object to the processing and are awaiting verification as to whether the Controller's legitimate reasons for processing prevail over yours (so-called **right of restriction**);
- object at any time to the processing of data and in particular to the processing of data processed for direct marketing purposes, including in relation to services identical to those already provided by the Data Controller, and for profiling purposes (so-called **right of objection**);
- receive in a commonly used, machine-readable and interoperable format the personal data concerning you, if they are processed pursuant to a contract or on the basis of your consent, and/or request to transmit the data to another data controller, if feasible (so called **right to portability**).
- If the processing is based on your consent, you shall have the right to withdraw your consent at any time. Withdrawal of consent shall not affect the lawfulness of the processing based on the consent before the withdrawal.

The aforementioned rights may be exercised upon request to be sent to the dedicated e-mail address [privacy@spimgenova.it](mailto:privacy@spimgenova.it) or by writing, by ordinary mail, to **S.P.Im. S.p.A.**, Via di Francia 1- 16149 – Genoa.

You also have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you in a similar way.

### **Right to complain**

If you believe that the processing of your personal data carried out by the Controller is in breach of the provisions of EU Regulation 2016/679, you have the right to lodge a complaint with the Office of the Data Protection Authority, as provided for in Art. 77 of EU Regulation 2016/679 (by e-mail, at [garante@gpdp.it](mailto:garante@gpdp.it), or by mail, to the Authority for the protection of personal data, which is located in Rome (Italy), Piazza Venezia 11 Building B, postcode 00187), or to take legal action in the appropriate courts, as provided for in art. 79 of the EU Regulation 2016/679.

I declare that I have read and received a copy of the above information notice

First and last name \_\_\_\_\_

Date and signature \_\_\_\_\_