



Bocconi Students for Real Estate

Recruitment Privacy Policy

1. Introduction

Bocconi Students for Real Estate – Student Association (hereby named BSRE) is committed to respecting your privacy and to complying with applicable data protection and privacy laws and regulations.

This Recruitment Privacy Policy (“Policy”) informs you about how BSRE processes information it collects about you during BSRE’s recruitment activities. It sets out what kind of Personal Data BSRE may collect about you and from other sources, how BSRE processes your Personal Data during its recruitment activities, and what rights you have in relation to such data. “Personal Data” means information relating to you or another identifiable individual.

We may provide you additional privacy information to this Policy via supplements and other notices. If there is a difference between such notices and this Policy, the notices should be considered first.

Our products, services and websites may contain links to other companies’ websites and services that have privacy policies of their own. BSRE is not responsible for the privacy practices of others and we recommend you read their privacy notices.

2. What Personal Data does BSRE collect?

BSRE collects Personal Data directly from you as well as from other available sources to the extent relevant and permitted by applicable local law. BSRE endeavors only to collect Personal Data that are necessary for the purpose(s) for which they are collected and to retain such data for no longer than necessary for such purpose(s). Subject to applicable local law and practice, the categories of Personal Data that are typically collected and processed in the recruitment context are:

- Information you provide: When you create an account in our recruitment management system or otherwise interact with BSRE (either directly or through an agency or other third party), you may be asked to provide BSRE with your information, such as
 - your name, street address, telephone number and email address and other contact details;
 - your competences, skills, experience and education, e.g. your CV or resume, previous employments, educational details and qualifications, third party references;
 - your preferences, e.g. preferred country of employment, areas of interest as well as your preferred ways to be contacted by BSRE); as well as
 - your user identity, e.g. usernames and other such information used in connection with authenticating you.
- Technical Information: When you access our services online, our web servers automatically create records of your visit. These records typically include IP-address, access times, the sites linked from, pages visited, the links and features used, the content viewed or requested, browser or application type, language and other such information. When you use our services or otherwise interact with us over telecommunications networks, certain additional information, such as your mobile subscription number, may be transmitted to BSRE by the telecommunications operator as a standard part of that communication.
- Depending on the location of the position, you may be offered the opportunity to provide diversity data such as race, gender, and veteran status. Provision of this diversity data is optional, and no employment decision will be made based on this data.
- Other information, such as information found from public sources as well as information related to credit or background checks, depending on the position you are applying for, and where necessary for the recruitment activities.

3. What will BSRE do with your Personal Data?

BSRE will collect, use, store and otherwise process your Personal Data for the purposes of BSRE’s recruitment or resourcing activities. Additionally, your Personal Data may be



processed for other purposes you have consented to, or in cases where another legal basis applies or where we are legally allowed to do so. Whenever necessary and subject to statutory record-keeping requirements, BSRE will delete and/or anonymize Personal Data that are no longer needed. If there has not been any recent activity on your profile, we may delete your profile after a reasonable time in compliance with applicable laws. Otherwise we will maintain your profile as long as you retain it actively in our systems for you to be able to apply for available positions which may become available to you from time-to-time.

BSRE will process your Personal Data for the following purposes:

- Communicating with you, in context of recruitment activities, such as:
 - To obtain additional information where necessary;
 - To inform you of available vacancies;
 - To provide you with information relating to your application and to fulfill your requests.
- Managing recruitment and resourcing activities, including activities related to organizational planning. In the course of recruitment activities, we may use your information:
 - To set up and conduct interviews and assessments;
 - To evaluate, select and hire applicants;
 - To conduct background and credit checks and assessments as required or permitted by applicable local law;
 - To contact third party references provided by you to evaluate your previous performances;
 - Or as otherwise necessary in context of recruitment activities.
- Development of services:
 - We may use your Personal Data to develop and improve our recruitment processes, websites and other related services. Where feasible, we use aggregated anonymous information in context of the development activities.
 - If you are hired, for populating your employee file and various systems and tools used in connection with employment at BSRE.
- Legal and regulatory compliance, including obtaining and releasing Personal Data as required by law, judicial organizations or practice in order to comply with legal obligations imposed on us.

BSRE processes your Personal Data pursuant to several legal bases, depending on the type of data and purpose of the processing. Under most circumstances, BSRE's processing of your Personal Data in the recruitment context is based on your request in the anticipation of entering into an employment agreement. BSRE will also process this information where required to comply with legal obligations to which it is subject, such as governmental reporting obligations. In some circumstances, BSRE will process your Personal Data pursuant to its own legitimate interests in operating its business, including conducting the above described activities for internal administrative purposes and ensuring network and information security. A different legal basis may be provided at the point where Personal Data is collected.

4. How is Sensitive Information treated?

BSRE aims to limit the collection of Sensitive Information [1] and shall only collect Sensitive Information if there is a legal justification for processing it, or if it is collected and processed with your express consent. BSRE recognizes the additional need to protect Sensitive Information. All Sensitive Information is processed in strict compliance with applicable local law and only by a restricted number of individuals who have a clear and justified need to know such information.

Sensitive Information may be processed where necessary to enable BSRE to exercise its legal rights or perform its legal obligations in the field of employment law or related fields of law. Examples of such obligations include ensuring the health and safety of BSRE's employees through the provision of a safe working environment or where the processing is carried out by a doctor or similar health professional bound by a duty of confidentiality to you and is necessary for medical purposes.



5. Who has access to your data?

It is BSRE's responsibility to implement appropriate access control measures to ensure that your Personal Data is only accessed by persons having a clear need to know such information.

The extent to which your Personal Data are made accessible will depend upon the nature of the data concerned. Prior to hire, your Personal Data is not made widely available. Some Personal Data, such as your resume, job history, and other information relevant to assessing your fitness for the position to which you have applied, are made available as needed to the BSRE team you are seeking to join, others within BSRE with a stake in the applied for role, and appropriate members of the BSRE Human Resources Department. Except as needed to assess your qualifications for the role, access to most of your Personal Data is restricted to certain experts (e.g. Human Resources, IT or Legal) to the extent necessary to perform their work tasks.

6. Transfer of your Personal Data

BSRE will not sell, lease, rent or otherwise disclose your Personal Data except as provided in this section:

Consent: BSRE may share your Personal Data if you have given your consent for us to do so.

BSRE companies and authorized third parties: BSRE may share your Personal Data with other BSRE companies or authorized third parties who process Personal Data for BSRE for the purposes described in this Policy or otherwise provide recruitment related services. In such cases BSRE will ensure that there is a genuine need to transfer your Personal Data and that measures are in place to safeguard the processing of your Personal Data through other BSRE companies or authorized third parties.

Authorized third parties include, for example, recruitment agencies, professional advisors, external legal counsel, consumer credit reporting agencies, recruiting systems providers, providers of assessments and other third-party suppliers.

Authorized third parties may technically have access to your Personal Data in the course of providing their services but will be contractually restricted (or subject to a professional or statutory duty of confidentiality) from processing your Personal Data for other purposes. BSRE also requires them to act consistently with this Policy and to use appropriate security measures to protect your Personal Data.

International transfers of Personal Data: BSRE is a global network that has affiliates, business processes, management structures and technical systems that cross-national borders. This means that your Personal Data may be transferred across international borders to countries other than the one where you are applying to as an applicant. Such other countries do not always have equivalent laws providing specific protection for or rights in relation to Personal Data or they have different rules on privacy and data protection. BSRE takes steps to ensure that there is a legal basis for such a transfer and that adequate protection for your Personal Data is provided as required by applicable law. Such steps include, for example, the use of standard contractual clauses approved by the European Commission or relevant authorities and the requirement to use appropriate technical and organizational security measures to protect your Personal Data. You may contact the BSRE Privacy Office to obtain additional information about the safeguards taken by BSRE in connection with these transfers. A copy of the unchangeable Standard Contractual Clauses can be accessed on the webpage of the European Commission.

· **Mandatory disclosures:** BSRE may be required by or under mandatory law to disclose your Personal Data to certain authorities or other third parties, for example, to government agencies responsible for the employment activities, statistical information or to the police or other law enforcement agencies, for example in context of conducting a background check.



- Mergers and acquisitions: Where BSRE takes steps to sell, buy, merge or otherwise reorganize its businesses in certain countries, this may involve disclosing Personal Data to prospective or actual purchasers and their advisers. In such circumstances, BSRE will take all reasonable steps to ensure that appropriate measures to protect Personal Data are taken by such prospective or actual purchasers and their advisers.
- Other: BSRE may disclose your personal data if it is necessary to protect your vital interests. BSRE may also disclose and otherwise process your Personal Data in accordance with applicable law to defend BSRE's legitimate interests, for example, in legal proceedings.

7. What steps are taken to safeguard Personal Data?

Privacy and security are key considerations for BSRE. We have assigned specific responsibilities to address privacy and security related matters. We enforce our internal policies and guidelines through an appropriate selection of activities, including proactive and reactive risk management, security and privacy engineering, training and assessments. We take appropriate steps to address online security, physical security, risk of data loss and other such risks taking into consideration the risk represented by the processing and the nature of the data being protected. Also, we limit access to our data bases containing Personal Data to authorized persons having a justified need to access such information.

8. Data quality

We take reasonable steps to keep the Personal Data we possess accurate and to delete incorrect or unnecessary Personal Data. We encourage you to access your Personal Data through your account from time to time to ensure that it is up to date. To the extent permitted or required by applicable local law or subject to your consent, we may use public sources in order to verify that Personal Data we hold is correct.

9. Your rights

With respect to the processing of your Personal Data, you will always have the rights as provided by applicable local law. In addition, this Policy provides you with the following rights:

- Right to access: You are entitled to be informed of what Personal Data BSRE holds about you, the purposes for which they are being processed and categories of recipients to whom they are being or may be disclosed. There may be certain categories of information prescribed by applicable local law that BSRE may lawfully withhold. If BSRE declines to provide access to any of the Personal Data you request, you will be provided with the reasons for such a decision.
- Right to request correction and deletion: Subject to applicable local law, you may be entitled to request BSRE to rectify, delete or block (as appropriate) your Personal Data that is incorrect, incomplete or unnecessary.
- Right to data portability: Subject to applicable local law, you may be entitled to receive a copy of certain Personal Data in a commonly used machine-readable format.
- Right to object: You may object to BSRE's processing of your Personal Data on compelling, legitimate grounds relating to your circumstances. Despite your objections, BSRE may be required or permitted by law to process your Personal Data.
- Right to restriction of processing: You have the right to require BSRE to restrict its processing of your Personal Data (1) during verification of whether your right to object applies; (2) if you contest the accuracy of the Personal Data, for the period enabling BSRE to verify the accuracy of the Personal Data; (3) if BSRE's processing is unlawful; and (4) BSRE no longer needs your Personal Data for the purposes of the processing, but you wish BSRE to retain the data for the establishment, exercise, or defense of legal claims. During the restricted processing period, BSRE will only process the Personal Data for storage purposes, with your consent, for the establishment, defense or exercise of legal claims, or other purposes permitted by law.

- Remedies in case of a violation: You are entitled to all rights and remedies provided by local applicable law. Generally, you should seek redress in respect of a violation of this Policy from the BSRE company which originally collected the relevant Personal Data.
- Right to withdraw consent: Where the data processing is based on your consent, you may withdraw that consent at any time. Withdrawal of that consent will not affect the lawfulness of processing based on that consent prior to its withdrawal.
- Right to lodge a complaint with a supervisory authority: If you are located in a European Union member state or within the European Economic Area, you have the right to lodge a complaint about BSRE's data collection and processing actions with the supervisory authority concerned.
There will be no adverse consequences in you exercising your rights as mentioned above. You are encouraged to use available BSRE recruitment tools to access, view and edit your profile. You may be able to delete the entire profile directly from the available tools or you may be required to request such deletion of your profile by contacting your available recruitment support.
In case you revoke your consent or object to certain processing activities or delete your profile completely, BSRE may be unable to continue the recruitment process with you.

10. Whom to contact?

BSRE is the controller of your Personal Data. If you have any queries about your Personal Data, contact primarily the relevant recruiting personnel through provided contacts or channels.

If you want to exercise your rights as described in the previous section of this Policy you may make a request in writing through provided contacts or channels.

BSRE may need to identify you and to ask for additional information to be able to fulfill your request. BSRE will fulfill your request within the timeframes required by applicable local law or, in the absence of such timeframes, within a reasonable time.

11. Changes to this Policy

BSRE may from time to time change this Policy or change, modify or withdraw access to this site at any time with or without notice. However, if this Policy is changed in a material, adverse way, BSRE will post a notice advising of such change at the beginning of this Policy and on this site's home page for 30 days. We recommend that you re-visit this Policy from time to time to learn of any such changes to this Policy.

[1] "Sensitive Information" means special categories of Personal Data as defined under applicable laws that may be processed only when there is a legal justification (e.g. authorized by law in the field of employment) or with the individual's consent. Such special categories include but are not limited to Personal Data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, or data which concerns their health or sex life or sexual orientation.