

## RECRUITMENT PRIVACY NOTICE

We are committed to respecting and protecting your privacy. This Privacy Notice is designed to let you know how we protect your information, and what your data rights are. This Privacy Notice sets out the basis on which the personal data collected from you, or that you provide to us, will be processed in connection with our recruitment and selection processes.

This Privacy Notice was updated on the 23rd May 2023.

## Data collection for recruitment at BIOS Health

Under the General Data Protection Regulation (GDPR), we (BIOS Health Ltd. and its affiliates) are a data controller and sometimes a data processor. This means we are responsible for the data we receive through our recruitment process and for determining the purpose(s) and manner in which it is processed.

In order to assist with our recruitment and selection process, we use Workable, an online application provided by Workable Software Limited. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

When you apply for a job opening posted by us, this Privacy Notice will apply to our processing of your personal information in addition to <u>Workable's Privacy Policy</u> which can be accessed via their website.

Where you apply for a job opening via the application function on a job site or similar online service provider ("Partner"), you should note that the relevant Partner may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner's Privacy Notice.

## What data will we collect?

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from you allows us to assess and confirm your suitability for employment and decide to whom to offer a job. In connection with our recruitment process, we may collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information
  provided through an online job site, via email, in person at interviews and/or by any other
  method
- In particular, we process personal details such as name, email address, address, telephone number, date of birth, qualifications, photos, and information relating to your employment history, skills and experience that you provide to us
- Correspondence records from your contact with us
- A record of your progress through our hiring process
- Information you have provided in relation to your right to work documentation

 At later stages in the process, we may collect information you have provided in relation to your salary and benefits history, and national insurance number. This will be only be stored if you are subsequently employed by us, otherwise it will be deleted from our records after the role closes or you withdraw from the recruitment process

#### Information we collect from other sources

Workable provides us with the facility to link the data you provide to us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows us to search various databases which may include your personal data (your CV/Resumé) - some publicly available and others not - to find possible candidates to fill our job openings. In the case that we ever use this functionality, we will obtain your personal data from these sources directly.

We may also receive your personal data from a third party who recommends you as a candidate for a specific position, or for our business more generally.

## How do we use your data?

The collected data will be used solely for the purposes of recruitment and selection. Our legitimate interest for storing your data is for the recruitment of employees for our business.

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied
- To consider your application in respect of other roles
- To communicate with you in respect of the recruitment process
- To enhance any information that we receive from you with information obtained from third party data providers
- To find appropriate candidates to fill our job openings
- To be processed by our service providers, such as Workable (you can read <u>Workable's Privacy Policy</u> on their website), and Partners (such as the job sites through which you may have applied)
- To inform candidates about future opportunities to work at BIOS

# How do we keep your information secure?

We take appropriate measures to ensure that all personal data is kept secure to prevent it from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business interest. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We have strict procedures and security measures to prevent, as much as reasonably possible, unauthorised access to or disclosure of your information. We seek to always handle your data with the utmost safety and security, however in the case of a suspected data security breach, we would notify you and any applicable regulator where we are legally required to do so.

# How long will we store your information?

We will hold your data for 24 months from the date at which we obtain your details whether by application for a specific role, or by other means as specified above. After this period, we will securely destroy your personal information.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for this reason.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file. The periods for which your data will be held will be provided to you under a separate retention policy.

Your personal information will be deleted immediately on one of the following occurrences:

- Your personal information is deleted by you (or by another person engaged by us); or
- We are requested to do so by you (or another person engaged by us)

## What rights do you have regarding your information?

In recognition of your data rights, we will fulfil any of the requests outlined below in line with regulatory timeframes. By law, you have a number of rights that apply in certain circumstances. These include the right to:

### Object to processing

This means you may not want your information used in some ways.

#### Restrict processing

This means we can no longer use your data. We will continue to store your data and note you on a list of users whose data we hold but cannot use in the future.

#### Be informed

You should have clear, accessible and transparent information provided to you so you understand how we work, protect and use your data.

#### Have access to your information

This enables you to check we are using your data correctly and is done by contacting us directly.

## Data rectification

If you see incorrect or incomplete data, you can ask to have that corrected.

#### Be erased

This means you can be "forgotten". It is important to know this is subject to some conditions, but the right means you can have all the information we hold on you deleted where there is no compelling reason for us to keep using it.

#### Move your data

This is referred to as portability. Your data should be provided for you in a way that is

accessible and provides you with the option of reusing the data in other situations.

### Complain

You have the right to lodge a complaint, and we will respect this and deal with it in a timely fashion in line with UK regulations.

#### Withdraw consent

This means you remove the right for us to use your data. You may do this at any point and without providing a reason for doing so. Removing your consent means you withdraw from the recruitment process.

## Changes in the Privacy Policy

We may change our privacy policy. In that case, the 'last updated' date at the top of this page will also change. Any changes to this Privacy Notice will apply to you and your data immediately. If these changes affect how your personal data is processed, BIOS will take reasonable steps to notify you.

## Contact Us

If you have any questions or concerns about this Privacy Notice or our privacy practices generally, or if you would like to exercise your statutory rights, you can contact our Data Protection Officer (as per GDPR Article 27), at:

BIOS Health Ltd 8 Bateman Mews Cambridge United Kingdom CB2 1NN

Email: careers@bios.health