

JOB APPLICANT GDPR DATA PROTECTION PRIVACY NOTICE

MEDPHARM LTD.

1. DATA PROTECTION PRIVACY NOTICE (RECRUITMENT)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a **privacy notice**) and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

2. WHO COLLECTS THE INFORMATION

MedPharm Ltd. (**Company**) is a **data controller** and gathers and uses certain information about you.

3. DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

4. ABOUT THE INFORMATION WE COLLECT AND HOLD

4.1 What information

4.1.1 We may collect the following information up to and including the shortlisting stage of the recruitment process and before making a final decision to recruit:

- (a) your name and contact details (*ie* address, home and mobile phone numbers, email address);
- (b) details of your academic history, qualifications, experience and employment history (including job titles, salary and working hours);
- (c) whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- (d) information regarding your criminal record;
- (e) information about your nationality and entitlement to work in the UK; and
- (f) details of your referees.

4.1.2 You are required to provide these categories of information (with the exception of your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs) to us to enable us to verify your right to work and suitability for the position.

4.2 How we collect the information

We may collect this information from you, your referees (details of whom you will have provided), your education provider and the Home Office.

Data might also be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

4.3 Why we collect the information and how we use it

4.3.1 We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our Data Protection Policy:

- (a) to take steps to enter into a contract;
- (b) for compliance with a legal obligation (e.g our obligation to check that you are eligible to work in the United Kingdom);
- (c) for the performance of a task carried out in the public interest; and
- (d) for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

4.3.2 We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

4.4 How we may share the information

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Usually, information will be anonymised. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

4.5 Sensitive personal information

Further details on how we handle sensitive personal information are set out in our Data Protection Policy, available from the company website.

4.6 Where information may be held

Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.

4.7 How long we keep your information

4.7.1 We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

4.7.2 If your application for employment is unsuccessful, we will hold your data on file for 6 (six) months after the end of the relevant recruitment process. We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into

account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

4.7.3 If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

4.8 **Your rights to correct and access your information and to ask for it to be erased**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where MedPharm is relying on its legitimate interests as the legal ground for processing.

Please contact a member of the GDPR compliance team, who can be contacted at dataprotection@medpharm.com if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask us for some but not all of the information we hold and process to be erased (the **right to be forgotten**) in certain circumstances. We will provide you with further information about the right to be forgotten, if you ask for it.

4.9 **Keeping your personal information secure**

4.9.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

4.9.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

4.10 **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.