

GDPR privacy notice for job applicants

Sigma Pharmaceuticals Plc (we), company number 01561802 and registered office at First Floor Roxburghe House, 273-287 Regent Street, London, W1B 2HA, whose trading address and correspondence address is at HD House, Imperial Way, Watford Hertfordshire WD24 4BB

1 What is the purpose of this document?

- 1.1 This privacy notice describes how we collect and use your personal information during any recruitment process with us. We are a "data controller". This means that we are responsible for deciding how we hold and use personal information about you and explaining it clearly to you.
- 1.2 This notice applies to prospective job applicants, this notice does not form part of any contract of employment or other contract to provide services.
- 1.3 It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.
- 1.4 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.
- 1.5 We have appointed a data protection officer (**DPO**) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO Email: dpo@sigmaplc.com

2 How do we collect information about you?

- 2.1 We collect personal information direct from you when you apply for a position with us, and in the course of work-related activities throughout the period of you working for us, as set out in more detail, below.
- 2.2 We also collect information about Staff from third parties, such as recruitment agencies, former employers, credit reference agencies or other background check agencies.
- 2.3 We may collect information about you from public sources, including social media sites such as but not limited to LinkedIn, Facebook.
- 2.4 We collect feedback from former employers.

3 What information do we hold?

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are special categories of more sensitive personal data

which require a higher level of protection (see further at section 3.3, below).

3.2 We will collect, store and use the following categories of personal information about you:

Information obtained during the recruitment process (the **Recruitment Data**):

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the recruitment process).
- Notes taken during interviews.

3.3 We may also collect, store and use the following special categories of more sensitive personal information:

- 3.3.1 Information about your health, including any medical condition, health and sickness records including doctor's certificates and return to work letters.
- 3.3.2 Information about your nationality, race or ethnicity.
- 3.3.3 Information about your religious beliefs, sexual orientation .
- 3.3.4 Information about your gender.
- 3.3.5 Genetic information and biometric data.
- 3.3.6 Information about criminal convictions and offences.

3.4 If you fail to provide certain information when requested, we may not be able to process any job application, or we may be prevented from complying with our legal obligations (such as to ensure any reasonable adjustments to accommodate the interview process).

3.5 It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

4 How we will use information about you

4.1 We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- 4.1.1 To process any job
- 4.1.2 to assess your fitness to being appointed into a position with the company.
- 4.1.3 Where we need to comply with a legal obligation.

4.2 We use your personal information as follows:

- 4.2.1 We use the Recruitment Data for: making a decision about your recruitment or appointment; carrying out pre-employment screening checks; checking you are

legally entitled to work in the UK; determining the terms on which you work for us; verifying information about you using publicly available sources where necessary.

- 4.3 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.4 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5 How we use particularly sensitive personal information

- 5.1 Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:
- 5.1.1 In limited circumstances, with your explicit written consent.
 - 5.1.2 Where we need to carry out our legal obligations and in line with our data protection policy.
 - 5.1.3 Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.
 - 5.1.4 Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- 5.2 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
- 5.2.1 We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

6 Information about criminal convictions

- 6.1 We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal obligations.
- 6.2 Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.
- 6.3 Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.



7 Data sharing

7.1 We do not envisage sharing your data during the recruitment process.

8 Transferring information outside the EU

8.1 All our personal information is hosted on servers located within the EEA. We do not transfer information outside the EEA during the normal course of our business.

9 Data security

9.1 We have put in place measures to protect the security of your information. Details of these measures are available upon request.

10 How long will we will use your information for?

10.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

10.2 To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

10.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

11 Your rights in connection with personal information

11.1 Under certain circumstances, by law you have the right to:

11.1.1 **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

11.1.2 **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

11.1.3 **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

11.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

11.1.5 **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for



example if you want us to establish its accuracy or the reason for processing it.

11.1.6 **Request the transfer** of your personal information to another party.

11.1.7 **Withdraw consent** in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are required to continue to process your information in accordance with another lawful basis which has been notified to you.

11.2 To exercise any of the above rights, please contact the DPO by email (dpo@sigmaplc.com).

11.3 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

11.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you have any questions about this privacy notice, please contact the DPO.