



NAPP PHARMACEUTICALS LIMITED (“NAPP”) CANDIDATE DATA PRIVACY NOTICE

What is the purpose of this document?

This Privacy Notice explains how Napp will process your information when you apply for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for.

In this Privacy Notice, references to “we”, “us” or “our” means Napp and “you” and “your” are to candidates applying to work for us.

This Privacy Notice supplements and should be read together with, the *Napp Website Privacy Notice*, which applies to all Personal Information collected on Napp’s Website.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter or on our application form, including name, title, address, personal email address, employment history, and qualifications.
- The information you have provided to the recruitment agency or directly to us, including immigration status.
- Any information you provide to us during an interview.
- Your responses to assessments, including psychometric tests.

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

- Information about your health, including any medical condition.
- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies
- Your named referees or referrals
- Background check providers
- Credit reference agencies
- LinkedIn and social media sites

How we will use information about you

It is in our legitimate interests to collect your personal information as part of your application. It is also of substantial public interest and a legal requirement that we collect certain "special categories" of more sensitive personal information. This information will enable us to decide whether to appoint you to the role, since it would be beneficial to our business to appoint someone to that role.

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

Having received your CV and covering letter or your application form and the results from the assessment(s) which you may be required to undertake, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out a criminal record and/or carry out any other suitable check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- 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.

Information about criminal convictions

We do not envisage that we will process information about criminal convictions.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application: the recruitment agency that referred you, assessment providers, relocation agencies and our network of independent associated companies where relevant to the role. Please note that these third parties or their data storage equipment may be located outside of the European Economic Area (EEA). However, any transfer of your Personal Information outside of the EEA is only permitted:

- where the transfer is to a place that is regarded by law as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards, for example, by using a contract for the transfer, which contains specific data protection provisions. You can request a copy of these contracts using the contact details below; or.
- where you have consented to this or there is another legal basis on which we are entitled to make the transfer.

All our third-party service providers and independent associated companies with whom your information is shared are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers whom act on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. If you require more information regarding the measures we have in place with the third parties whom receive your personal data, please use the contact details below.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Data retention

How long will you use my information for?

We will retain your personal information for a period of up to six (6) months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

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 a fixed period on that basis.

Your rights

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

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

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing using the details below.

If you wish to make a complaint, we would like the opportunity to discuss this with you first. However, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Contact information

If you have any questions about this privacy notice or how we handle your personal information, please contact the Napp Compliance Officer or Napp Head of HR.

Last updated 25 May 2018