

PRIVACY NOTICE FOR RECRUITMENT ACTIVITIES

- 1. The personal information we use**
 - 1.1 Information we collect directly from you**
 - 1.2 Information we collect from other sources**
 - 1.3 Other information we use about you**
 - 1.4 Special categories of personal data**
 - 1.5 Information you provide about others**
- 2. How we use your personal information and the basis on which we use it**
- 3. Your rights over your personal information**
- 4. Information Sharing**
- 5. Information Security and Storage**
- 6. International Data Transfer**
- 7. Contact Us**
- 8. Changes to the Policy**

This privacy notice for recruitment activities describes how **Servier Laboratories Ltd and Servier Research and Development Ltd** ('we', 'us', 'Servier') collects and processes personal information about you when you apply for a role with Servier, how we protect this information, and your rights in relation to this information.

Personal information is information, or a combination of pieces of information that could reasonably allow someone to be identified.

When you apply for a role with Servier, our personal information will be used to assess whether you are suitable for a role with us and to put in place arrangements for any interviews and assessments. This applies whether you have made an application direct to us, through an agency or a third party.

1. PERSONAL INFORMATION WE USE

We will collect personal information about you from a variety of sources, including information we collect from you directly (e.g. when you contact us), and information we collect about you from other sources.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any future contractual relationship we have with you. Failure to provide this information may delay or stop the recruitment process. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

1.1 Personal information we collect directly from you

The categories of personal information that we collect directly from you are:

- (a) personal details (e.g. name, preferred language, proof of identity)
- (b) contact details (e.g. phone number, email address, postal address and mobile number)
- (c) family occupation details (section 2 of the application form)
- (d) right to work and residence status (e.g. passport/visa details)
- (e) job related information (e.g. CVs, resumes, application forms, proof of address, professional memberships affiliations, referee's information)
- (f) driving licence
- (g) evidence of qualifications (e.g. copies of your degree or highest qualifications and ABPI certificates)
- (h) bank details (e.g. for travel expenses)

1.2 Information we collect from other sources

In addition to the information you provide us directly, we also collect information about you from third parties including recruitment agencies, and pre-employment screening agencies during the application and recruitment process. We also collect information about you from public sources including internet recruitment networks such as LinkedIn. An existing employee or colleague may recommend that we consider you for a role in Servier. In this regard, you are informed for each of the above process before the collection.

The categories of information that we will usually need collect about you from third parties includes:

- (a) references from previous employers (e.g. former managers, colleagues and professional associates)
- (b) with your explicit consent and for a short-listed applicant, the results of credit, fraud and financial probity checks and other background checks such as checks for criminal convictions considered unspent under The Rehabilitation of Offenders Act 1974 if the position require this check, and verification of existing and previous addresses, carried out by our pre-employment screening agency

1.3 Other information we use about you

We may also collect, and process personal data generated by Servier including:

- (a) recruitment related emails (e.g. invitation to interview, request for reference, rejection emails), letters of offer of employment (if you are successful)

- (b) feedback on assessments and interviews
- (c) payment of travel expenses
- (d) photographs taken at interview stage

1.4 Special categories of personal data

Some of the categories of information that we collect are special categories of personal data (also known as sensitive personal information). In particular, we may process personal information that relates to your health which could include details of any disabilities for the purpose of making reasonable adjustments to the recruitment process.

As part of pre-employment checks we collect information about your legal right to work and checks for criminal convictions and offences in order to carry out our obligations and exercise specific rights in relation to employment.

1.5 Information you provide about others

We may collect and process information provided by you about your referees including their name, contact details and relationship to you for the purposes of reference checking. We may also collect, and process information provided by you about your immediate family occupations (section 2 of the application form) for the purpose of identifying any potential conflicts of interest.

Please only provide us with information about referees whom you have confirmed are happy to be contacted by us. **If you provide us with any personal information about others, we request that you provide them with a copy of this Privacy Notice.**

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- (a) administer the recruitment process in order to assess your suitability to do the job you have applied for, and to contact you to arrange, conduct, evaluate and feedback on assessments and interviews
- (b) ensure that the information we hold about you is kept up to date and accurate
- (c) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (d) manage our relationship with you effectively including to deal with your enquiries and requests
- (e) exercise our legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud claims or violations of law
- (f) improve the operation of and management of our recruitment processes

We must have a legal basis to process your personal information and this can include:

- (a) to meet our legitimate interests for recruitment and business management purposes. These include identifying and evaluating suitable candidates for positions within Servier, record-keeping related to recruitment processes, analysing the recruitment process and outcomes. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms. For more information regarding this process, please contact us using the details in section below.
- (b) to take steps prior to potentially entering into a contract of employment with you
- (c) to comply with our legal obligations in the field of employment, including health and safety obligations, occupational health obligations (such as to make appropriate adjustments to the recruitment process your role in accordance with your medical requirements), to comply with Home Office requirements (e.g. right to work checks e.g. biometric data) and to undertake pre-employment screening checks (such as criminal convictions)
- (d) for the establishment, exercise or defence of a legal claim

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to certain exceptions in accordance with applicable law. These include the following rights to:

- access your personal information. There may be some exceptions, for instance in the event of a manifestly unfounded or excessive request, or if the exercise of this right affect a legal investigation or the right of freedom of another data subject, which means you may not always receive all the information we process about you;
- rectify any inaccurate information we hold about you;
- erase your personal information except in certain circumstances for example if it is necessary for us to process your personal information to comply with a legal obligation (as described in section 2 above) or for the establishment, exercise or defence of a legal claim;
- restrict our use of your personal information in certain circumstances;
- object to our use of your personal information in certain circumstances where we use your personal for our legitimate interests (as described in section 2 above); and
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability);

- lodge a complaint with your data protection authority (the Information Commissioner's Office in the UK: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113)

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate. We will contact you if we need additional information from you in order to honour your requests.

4. INFORMATION SHARING

We will share your personal information with third parties under the following circumstances:

- **Service providers and business partners.** We may share your personal information with our service providers and business partners that perform services and other business operations for us to support recruitment processes. These third parties include pre-employment screening providers; recruitment agencies; travel agencies, hotels and banks.
- **Servier group companies.** Servier group companies. Servier Laboratories Ltd is ultimately owned by Les Laboratoires Servier, so we work closely with other businesses and companies that fall under the Servier group family. We may share certain information about you with Les Laboratoires Servier and other Servier group companies where this is necessary for business planning purposes and internal auditing purposes. Information on the global presence of the Servier group can be found here: <https://servier.com/en/company/global-presence/>.
- **Law enforcement agency, court, regulator, Home Office, government authority or other third party.** We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on "International Data Transfer" below for more information.

5. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

Servier will keep your personal information for as long as you have an on-going job application in process. Once all on-going applications processes have expired (either where you have entered into an employment contract with us, have withdrawn your application, or have been notified that your application has been unsuccessful), Servier will retain your personal information for a period of time that enables us to :

- Maintain business records for analysis and/or audit purposes

- Maintain statistical information about applicants to help inform recruitment activities
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Deal with any complaints

Except required by law or a potential claim, we will not keep your personal data for more than one calendar year after the on-going recruitment process has ended.

Servier will delete your personal information when it is no longer required for these purposes. If there is any information that Servier is unable, for technical reasons, to delete entirely from their systems, Servier will put in place appropriate measures to prevent any further processing or use of the data.

6. INTERNATIONAL DATA TRANSFER

Given the global nature of the Servier Group, we may transfer personal information including sensitive personal information to other entities of the Servier Group based outside the UK to appropriately deal with your enquiry. A list of Servier Group entities and where they are based is available here: <https://servier.com/en/company/global-presence/>.

In addition to Servier Group entities overseas, your personal information may be transferred to, stored, and processed by an international organisation or a third party located in a country that is not regarded as ensuring an adequate level of protection for personal information under **Data Protection Law applicable in UK**, including but not limited to the retained EU law version of the General Data Protection Regulation ((EU) 2016/679), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018; the Data Protection Act; and the Privacy and Electronic Communications Regulations 2003 as amended or by the Information Commissioner's Office in the UK.

We have put in place appropriate safeguards (such as contractual commitments and standard contractual clauses) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

7. CONTACT US

Servier Laboratories Ltd is the controller responsible for the personal information we collect and process. If you have questions or concerns regarding the way in which your personal information has been used, please contact us using the contact details below:

- The Data Protection Relay can be contacted at: DataPrivacy-UK@servier.com
- Telephone: 01753 666409
- Post: Compliance Department, Servier Laboratories Ltd, Sefton House, Sefton Park, Bells Hill, Stoke Poges, Buckinghamshire SL2 4JS

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or



concern, you have the right to make a complaint to the data protection authority of the UK (the Information Commissioner's Office in the UK: <https://ico.org.uk/global/contact-us/> or call on 0303 123 1113) or your local data protection authority if you are based outside the UK.

8. CHANGES TO THE POLICY

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time. If we change this privacy notice, we will notify you of the changes by way of a banner on our Website. In the case of substantial changes on our policies or practices, we ensure the same level of protection of your data protection collected in the past.

A copy of this privacy notice available on the www.servier.co.uk website.

JUNE 2021