

## **PRIVACY NOTICE**

UDG Healthcare plc (company number: 12244) and its related companies (including all Group Companies) ("we", "our", or "us") is a leading international partner of choice delivering advisory, communication, commercial, clinical and packaging services to the healthcare industry, employing over 9,000 people with operations in 24 countries and delivering services in over 50 countries. We are committed to ensuring that we when collect and use information about candidates, we do so in accordance with the EU General Data Protection Regulations ("GDPR") as well as other global legislation where our offices are located. "Group Companies" means any subsidiary of UDG Healthcare plc as defined by section 7 & 8 of the Irish Companies Act 2014.

For the purposes of GDPR, the data controller is UDG Healthcare plc of 20 River Walk Citywest Business Campus Dublin 24 D24 NR23.

### **What is the purpose of this document?**

We are providing you with this Privacy Notice because you are applying for work with us (whether as an employee, worker or contractor). It tells you how and why your personal data will be used and for how long we will usually retain it.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By submitting your personal information to us through any means, you are accepting the practices described in the Privacy Notice. If you do not understand or do not agree with any of the terms of this Privacy Notice, please contact us before submitting your personal data.

### **What information do we collect?**

We will collect a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the country in which the role is located.

We may collect this information in a variety of ways. For example, from application forms, CVs or resumes that you provide to us, 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 only seek information from third parties once a job offer has been made to you, and will inform you that we are doing so.

We will store your data in a range of different places, including on your application record, in our HR & recruitment management systems, and other IT systems (including email).

## **How we will use information about you?**

We will use the personal information we collect about you to decide whether to enter into a contract with you for the role that you have applied for, or other similar roles that we believe may be of interest to you. More specifically, we will use your information 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 our legal or regulatory requirements.
- To match your details with all of our job vacancies, to decide if we have other positions that might be suitable for you and of interest to you
- Where you provide your prior consent as a candidate, to send your personal information to clients in order that the client may consider you for a role that they have placed with us as recruiter on their behalf.
- To send you emails that alert you to new jobs that might be of interest to you

Having received your CV/resume and covering letter or application form, 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 may carry out a criminal record check (if it is necessary for us to do so because of the nature of the role) 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 process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, 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 will collect information about your criminal convictions history only if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory) and:

- We are legally required by a regulatory body to carry out criminal record checks for those carrying out the role; or
- The role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

## **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**

We may share your personal information with any member of our Group, which means our subsidiaries as defined in section 7 & 8 of the Irish Companies Act 2014.

UDG Healthcare plc is a global company. The nature of our business, operations and services require us to transfer your information (from time to time) to our associated offices and/or companies. We may transfer the information we collect about you to countries other than your home country or other than the country in which the information is originally collected or where you are registered as a candidate. Your personal information will be accessible by our other offices internationally including (but not limited to), in the UK, EU, USA and Japan.

We will take appropriate steps to ensure that your information is protected and handled in accordance with the legal requirements and as described in this Privacy Notice.

We may also share your information with selected third parties including:

- Business partners, clients, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- We may disclose your personal information to third parties:
  - In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
  - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any contract between us and other agreements; or to protect the rights, property, or safety of UDG Healthcare, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **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.

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

### **Data transfer**

The personal data that we collect from you may be transferred to, and stored (whether in hard copy or electronically) at a destination outside the European Economic Area ("EEA"). It may also be processed by our employees operating outside the EEA who work for us or for one of our suppliers. Such employees may be engaged in, among other things, the processing of your application, the creation of your candidate profile and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing

### **Data retention**

We will retain your personal information for a period of 24 months after we have communicated to you our decision about whether to appoint you. 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 applicable laws and regulations.
- Let you know about any further opportunities that may arise in the future that we think may be of interest to you based on your personal information and that we may wish to consider you for

### **Your rights in connection with personal information**

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 processing it lawfully.
- **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 that makes you want to object to processing on this ground.
- **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 our Data Protection Officer in writing at our address given above.

#### **Purpose of Processing Activities, Right to object to processing or withdraw consent**

We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis (or bases) for each activity we may undertake for you as follows:

- Processing an application for a job - legitimate interest
- Searching to identify other roles in our Group or for our clients that may be of interest to you - consent
- Placing you in a role – legal

You have the right to object to our processing of your data on the grounds of our legitimate interest. If you do so, we will not be able to continue to process your application. You may also withdraw your consent for us to process your data in order to identify other roles in our Group or for clients that may be of interest to you. If you do so, we will not be able to look for other roles for you. To object to us processing your data or to withdraw your consent, please contact our Data Protection Officer (DPO) at our office address set out above.

#### **Data protection officer**

We have appointed a 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 either at [data.protection@udghealthcare.com](mailto:data.protection@udghealthcare.com) or at our office address above.

You have the right to make a complaint at any time to the supervisory authority for data protection issues in the country in which you reside, but we would welcome the opportunity of resolving any complaint you may have with us directly.