

# **Privacy Notice for Candidates**

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### 1. Controller and contact information

**Kyowa Kirin International UK Holdco Ltd,** which will be renamed **KKI Grunenthal UK HoldCo Ltd** (known as "Grünenthal Meds") (known as "Grünenthal Meds") jointly with local affiliates (hereinafter referred to as "our" or "we") are the "data controllers" of the personal data that we hold about the candidate (or "you").

The local affiliates are:

- Kyowa Kirin International NewCo Netherlands B.V.
- Kyowa Kirin International NewCo France SAS
- Kyowa Kirin International NewCo Germany GmbH
- KKI NewCo Spain S.L
- Kyowa Kirin International NewCo Italy S.r.I
- Kyowa Kirin International NewCo Ireland Ltd.
- Kyowa Kirin International NewCo Sweden AB
- Kyowa Kirin International UK NewCo Ltd

If you have any questions regarding our use of your data or to exercise your data subject rights, please contact our us at:

Name of the company: Grünenthal Meds

Address: Galabank Business Park, Galashiels TD1 1QH

Email: dataprivacy.grt-meds@grunenthal.com

You can also contact our Data Protection Officer at: dpo-grunenthalmeds@kinast.eu

Please ensure you do not send your CV, cover letter nor any other application form to the email above. This email is only intended to answer any questions you may have regarding how we process your personal data.

You can also see our corporate Privacy Policy for further information on how we process your personal data.

#### 2. Personal data we collect

For the purposes of recruitment, we will be collecting personal data provided by you or your recruitment agency, such as:

- Candidate CV (including identifying and professional information along with any other information you provide);
- Email;
- Phone number;



- Home address, which is required at offer stage;
- Information available on social media platforms you use or other information available online, where permissible and according to applicable laws;
- And any other information you provide to us.

We also carry out a pre-employment screening for all roles where needed for a specific job role and to the extent permitted by national law (including confirmation of the absence of a criminal record, right to work in relevant jurisdictions, professional qualifications). In practice, we may receive information from background checks that our recruitment agencies may collect from you. However, we will only receive this information in the form of comments on these checks, we will not receive any copies of these records.

The process of pre-employment screening is undertaken at the end of the recruitment process and in most cases forms a condition of our offer to you.

You may decide not to provide your personal information to us. However, failure to provide this information will potentially exclude you from the process.

## 3. Purposes and legal basis

We will keep, record, and hold the personal data which you have provided in the online application form, via email or via a third-party supplier, as applicable, for the following purposes:

- For our legitimate interest in using your information to manage and keep you updated on the status of your application and hiring process, for administrative, and reporting purposes, for the purposes of equal opportunities monitoring, and to protect our legal interests, such as the establishment, exercise or defense of legal claims and to validate your claims and suitability for the role.
- For necessity to enter into a contract. This applies when the candidate is successful and we will enter into a contractual relationship.
- To comply with applicable laws, including anti-discrimination laws.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

### 4. Recipients of your personal data

Your data will not be disclosed to any third parties outside of our group of companies with the exception of the recruitment partners and technology providers supporting our recruitment process. If your application is successful, your offer of employment will be subject to pre-employment screening via a third party service provider. We have contracts with all third party service providers to ensure they adhere to the requirements of data protection law.

## 5. Transfers of personal data to a third countries

Your personal data will be processed by our third party vendors, including recruitment agencies and technology providers as part of the selected services adopted by Grünenthal Meds, in order to carry out normal business practices. If we do process your personal information outside of the EEA or the UK, we will do so using one of the adequate safeguards permitted by regulators for transfers of personal data outside of the EEA or the UK. For example, adequacy decisions, standard contractual clauses and any required supplementary measures to ensure your personal data is protected according to the data protection law applicable in your country.



A copy of the relevant mechanism can be provided for your review on request to the contact details at the top of this Privacy Notice.

### 6. Data Retention

We will hold your personal data on our systems for as long as is necessary to fulfil the purposes described in this notice.

If your application is successful, we will hold this data as part of your employee record, and you will be provided with a copy of our Employee Privacy Notice.

For the applicants that do not meet our recruitment criteria a current time period, we will keep their details and CV for a period of six months after the end of the recruitment procedure so as to check for another employment match during these months.

## 7. Data subject rights

You have a number of data subject rights which you can exercise, including the right of access, correction, restriction of processing, deletion, **objection**, portability or the right to withdraw your consent. To exercise any of these rights, please contact us using the contact information set out in this privacy notice above. We may ask you to provide details or evidence to confirm your identity as well as information about your interactions with us in order to retrieve your personal information. You also have the right to lodge a complaint with the supervisory authority of your habitual residence.

### 8. Changes to this privacy notice

We may change this Privacy notice from time to time in response to technical, legal or business developments. You can check the "effective date" posted to see when the Privacy Notice was last updated. If we make any material changes we will take appropriate measures to inform you according to applicable laws.

This Privacy Notice was last updated on June 2023