

Recruitment Privacy Notice

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1. Introduction

T-Therapeutics and its subsidiaries and affiliates (“Company”, “we”, “us”, “our”) may operate in many different countries. Some of these countries have laws related to the collection, use, transfer and disclosure of the personal information of individuals, including Candidates. We take these obligations very seriously and are committed to protecting the privacy of individuals that apply to work with us.

This Privacy Notice applies to the individual applying for a job role with T-Therapeutics, either directly, via a recruitment agency or through a third-party source. The purpose of this Recruitment Privacy Notice (“Notice”) is to give T-Therapeutics individuals that apply for work with us, candidates (“Candidates”) information about what personal information we collect; how we collect, use and disclose that information and the legal grounds for us doing this; and their rights in respect of their personal information.

If your application become an employee, worker or contractor of T-Therapeutics is successful, your personal information will be handled in accordance with our Employee Privacy Notice which will be notified to you and is found on PeopleHR.

It is important you read this Notice, so that you are aware of how and why we are using your personal information. We will provide you with a revised Notice if we make any substantial updates.

2. Controller and contact details

T-Therapeutics Limited is the Data Controller of your personal information and is responsible for how your personal information is processed.

In the UK, Data Protection Legislation means the Data Protection Act 2018 (‘DPA 2018’), United Kingdom General Data Protection Regulation (‘UK GDPR’), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (‘PECR’) and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the General Data Protection Regulation (Regulation (EU) 2016/679) (‘EU GDPR’). This includes any replacement legislation coming into effect from time to time.

We are registered with the UK’s supervisory authority, the Information Commissioner’s Office (the ICO) with registration number ZB501292.

2.1. Contact information

- **Business Name:** T-Therapeutics Limited
- **Address:** Abington Hall, Granta Park, Great Abington, Cambridge, CB21 6AL
- **Phone:** 01223 961480
- **Email:** info@t-therapeutics.com

2.2. Data Protection Officer

We have appointed the DPO Centre Ltd as our **Data Protection Officer (DPO)** to help us monitor internal compliance, inform, and advise on data protection obligations, and act as a point of contact for you (data subjects) and the ICO.

If you would like to exercise one of your rights, or you have a question or a complaint about this statement or the way your personal information is processed, you can contact the **Data Protection Officer** at:

- **Email:** j.marku@dpocentre.com

3. What information do we collect about candidates?

Personal data, or personal information, means any information about a living individual (data subject) from which that person can be identified. It does not include data where any features which could identify individuals have been removed (anonymous data).

3.1. Sources of personal information

We collect Personal Information from the following sources:

- Through the application and recruitment process
- Either directly from you
- Sometimes from an employment agency, previous employer, or background/pre-employment check provider.
- Publicly accessible sources, such as LinkedIn
- Employment agencies and recruiters
- Third party websites
- Providers of sanctions and “politically exposed persons” screening lists.

We may sometimes collect additional information from third parties including former employers, credit reference agencies and referees.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us. If applicable, please refer to the Employee Privacy Notice for more information.

3.2. Personal information collected and processed

We refer to such information in this Notice as “Personal Information.” We collect the following Personal Information:

Personal information collected	Purpose
Contact details, for example, your name, nationality, postal address, telephone number, e-mail address.	<ul style="list-style-type: none"> • Facilitating communications. • Communicating to provide you with information. • Responding to your requests or communications.
Current and former job titles and positions	<ul style="list-style-type: none"> • Verifying your suitability for the job
Identification information such as passport ID, date of birth, other paper copies of identity	<ul style="list-style-type: none"> • Verifying your identity as part of our recruitment process. • Verifying that you are legally entitled to work in the relevant country.
Academic qualifications such as copies of certificates	<ul style="list-style-type: none"> • Verifying your suitability for a job opening at T-Therapeutics.
Previous employment references	<ul style="list-style-type: none"> • Verifying your suitability for a job opening at T-Therapeutics.
Right to live/work data	<ul style="list-style-type: none"> • Complying with our legal and regulatory obligations.
Current/Historic compensation data	<ul style="list-style-type: none"> • Facilitating compliance with applicable laws, regulations or other requirements.

Assessment information such as the results of psychometric	<ul style="list-style-type: none"> Assessing your suitability for the role.
Special categories of Personal Information such as details about your health.	<ul style="list-style-type: none"> To comply with our legal obligations, including to ensure your health and safety in the work place and to assess your fitness to work. To provide appropriate workplace adjustments. To monitor and manage sickness and absence and to administer benefits.

3.3. Disclosure of your personal information

Where necessary to fulfil the purposes described in this Notice, T-Therapeutics may disclose your personal data to certain third-parties, vendors and service providers or affiliated employees, contractors and entities as described below.

Whenever T-Therapeutics shares your personal data with companies acting as our authorised agents and service providers, these companies agree to use your personal data only for specified purposes.

Furthermore, the recipient will implement and maintain reasonable security procedures and practices appropriate to the nature of your information to protect your personal data from unauthorised access, destruction, use, modification or disclosure.

We will transfer and disclose your personal data to the following categories of recipients where it is lawful to do so, and subject to the implementation of appropriate protections:

Category of third party	Purpose for disclosure
Recruitment or Human Resource service providers	<ul style="list-style-type: none"> Business requirement, where there is a direct applicant, and we forward this application to a recruitment agency where we have contracted with them exclusively for that role.
Background check vendors	<ul style="list-style-type: none"> To verify that academic, training and professional qualifications are accurate and complete
Law enforcement, government, courts or regulators, or fraud prevention agencies	<ul style="list-style-type: none"> To verify your identity. Our public or legal duty to assist with detecting fraud and tax evasion, litigation, investigation or defending legal rights.

3.4. Legal basis for processing your personal information

Processing and sharing for any of the above purposes is necessary to enable us to pursue our legitimate business interest (or the legitimate interests of one or more of our affiliates) in:

- personnel recruitment and HR forecasting,
- the prevention or detection of fraud or abuses in our job application process, and
- the maintenance of records of business activities around recruitment.

T-Therapeutics may also process your personal data for other reasons, as outlined below:

- to comply with legal and regulatory obligations,
- to decide whether to enter into a contract of employment with you,
- to establish, exercise or defend our legal rights and/or for the purpose of (or in connection with) legal proceedings (including for the prevention of fraud), and
- with your consent.

At all times, T-Therapeutics will only use your personal data when the law allows us to.

Generally, we do not rely on consent as a legal basis for processing your personal data in circumstances where: (i) the law specifies that we have to process your personal data; (ii) we need to process your data to perform a contract with you; (iii) we have a public interest to do so; or (iv) we have a legitimate business reason for doing so.

3.5. Do we need your consent?

Rather than relying on your consent, T-Therapeutics largely relies on more suitable lawful bases for processing your personal data, as outlined in this section. In the limited circumstances where we are processing your data on the basis of consent you have provided us, and we have no other legal justification or obligation to continue the processing, you have the right to withdraw your consent for that specific processing at any time. Where the lawful basis of consent applies and you would like to withdraw your consent, please contact the DPO using the contact details above.

3.6. Change of purpose

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. International transfers of personal information

We may transfer your Personal Information to countries outside the UK (including countries other than where a Candidate is normally based and located outside the UK, European Economic Area (“EEA”) or country without a UK/EU adequacy decision that have different data protection regimes and which are not deemed to provide an adequate level of protection for Personal Information. To ensure that Personal Information is sufficiently protected if transferred outside the EEA and UK we have in place appropriate safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts approved by the UK government or European Commission (as relevant) providing adequate protection of personal information.

5. Data security

T-Therapeutics will take appropriate measures to protect Personal Information that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Information.

Access to Personal Information within T-Therapeutics will be limited to those who have a need to know the information for the purposes described above, and may include your managers and their designees, personnel in HR, IT, Compliance, Legal, Finance and Accounting and Internal Audit.

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 of your Personal Information where we are legally required to do so.

All of our third-party service providers and other entities in the group 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 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.

6. Data retention

Our retention periods for Personal Information are based on business needs and legal requirements. We retain Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, as set out in this Notice, and any other permissible, related purposes. For example, we may retain certain information to comply with regulatory requirements regarding the retention of such data, or in the event a litigation hold is imposed. When Personal Information is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

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

Details of retention periods for different aspects of your personal information are available in our Retention Schedule, including, for applicants, we retain the data collected through the application process for 6 months after we notify you of the outcome; this is in line with the law (for example the Equality Act) and industry guidance such as the Chartered Institute of Personnel and Development guidance on retention of HR records.

7. Data accuracy

We will take reasonable steps to ensure that the Personal Information processed is reliable for its intended use and is accurate and complete for carrying out the purposes described in this Notice.

8. Your rights

You have the right, in certain circumstances, to object to the processing of your Personal Information.

You also have the right, in certain circumstances, to access your Personal Information, to correct inaccurate Personal Information, to have your Personal Information erased, to restrict the processing of your Personal Information, to receive the Personal Information you have provided to us in a structured, commonly used and machine-readable format for onward transmission, and to object to automated decision-making.

Please note that compliance with certain individual rights be exempt in accordance with applicable data protection laws or other laws and regulations.

Under Data Protection Legislation, such as the UK GDPR, you have a number of rights regarding our processing of your data. To exercise these rights, please contact the **Data Protection Officer** using the contact details above. We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

- **The right to be informed about our collection and use of personal data:** You have the right to be informed about the collection and use of your personal data. We ensure we uphold this right with our internal data protection policies and through this and other privacy notices. These are

regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

- **Right to access your personal information:** You have the right to access the personal information that we hold about you by making a request. This is referred to as a 'Data Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf) we will typically provide it to you or them within one month from when your identity has been confirmed.
- **Right to rectify your personal information:** If any of the personal information we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.
- **Right to object or restrict our processing of your data:** You have the right to object to us processing your personal information for particular purposes or have its processing restricted in certain circumstances.
- **Right to erasure:** You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.
- **Right to portability:** The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used, and machine-readable format. It also gives you the right to request that a controller transmits this data directly to another controller.
- **Rights in relation to automated processing:** An automated decision is one that is made by our systems rather than a person. Under Data Protection Legislation, you have the right to express your concerns and object to a decision taken by purely automated means. You also have a right to request that a person review that decision. This right is unlikely to apply to T-Therapeutics use of your data, as any automated processing we carry out is unlikely to make decisions and would include human intervention. If you would like to discuss this in further detail, please contact us as set out above.

9. Your obligations

It is important that the personal data we hold about you is accurate and current. You are responsible for making sure the information you give us is accurate and up to date. You must tell us if anything changes, as soon as possible. We will ensure all changes are logged appropriately.

10. Consequences of not providing personal information to us

Providing your personal data to T-Therapeutics is voluntary for you. Should you choose not to provide your personal information to us, your interaction with us may be adversely impacted. Also, the provision of your personal information may be necessary to allow us to perform a contract with you and/or to provide services to you.

11. Questions or complaints

If you are based in certain jurisdictions, you may lodge a complaint with a supervisory authority in that country, including in your country of residence, place of work, or where you believe an incident took place. For example, if you are based in the UK, you may choose to file a complaint with the Information Commissioner's Office.

Please note that the ICO will not normally consider an appeal until you have exhausted your rights of complaint. You can make a complaint to us about how your data has been handled by contacting privacy@t-therapeutics.com. Please see the ICO website (link below) for further advice.

If you remain dissatisfied, you may wish to contact the ICO:

- Website: <https://ico.org.uk/make-a-complaint>
- Post: Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Telephone: 0303 123 1113



12. Changes

We keep our privacy notices under regular review. We reserve the right, at our discretion, to change, modify, add or remove sections of this Notice at any time. You are encouraged to review this Notice from time to time for updates, or to contact T-Therapeutics for more information.