

## **PRIVACY NOTICE – JOB APPLICANTS**

### **1. Purpose**

Purpose of this Privacy Notice is to provide job applicants information about processing of their personal data in Faron Pharmaceuticals Ltd (“Faron”). This privacy notice gives general understanding of such personal data processing. All the information provided in this Privacy Notice may not be applicable to each different data processing situation related to job applicants. If you want more detailed information in relation to how specifically your personal data is being processed, please contact Faron by using the contact information provided in section 13 of this Privacy Notice.

### **2. Data Controller**

In respect of each data subject’s personal data, the data controller is regarded to be Faron organising the recruitment. To certain extent, Faron Group companies are sharing data systems, which are provided by Faron to the entire group. The data subjects can always use rights by contacting Faron as instructed in section 13.

### **3. Data Subjects**

Job applicants filing job applications can be external applicants not currently working at Faron and seeking open vacancies advertised by Faron or internal applicants who are Faron’s current employees. Job applications can be open applications or intended for certain specific job opening.

### **4. Purposes and Legal Basis of Personal Data Processing**

#### **a. Purposes of Processing**

The main purpose of personal data processing is to receive and handle application from job applicants for recruitment and selection purposes, allow access to recruitment tools and carry out the recruitment process i.e., implementation of the recruitment process including evaluation of applicants and informing applicants of the choices made. The purposes of personal data processing include personal data processing required for filling vacancies from the submission of an application to the selection of the employee(s), concluding an employment contract with the selected employee(s) and implementing labour law rights and obligations as well as collecting statistics on the recruitment process.

In certain cases, the data may be used for fulfilling of Faron's or the local Faron Group company's statutory obligation. Such obligations may relate to e.g., providing that the recruitment decisions have been non-discriminatory.

Certain data processing activities may be outsourced to third parties, in which case such third-party processors operate on behalf of Faron., e.g., the IT/operational management on-line application system may be outsourced to an external IT supplier and the data may also be processed by external recruitment consultants who are handling applicant assessments and supporting Faron in the recruitment process.

#### **b. Legal Basis of Personal Data Processing**

Lawful grounds to process the data subject's personal data are:

- Legitimate interest of the data controller: Processing of the personal data is based on the data controller's legitimate interest to process personal data for the purposes of recruiting as well as the connection between Faron and the applicant participating to the recruiting process. There is a factual connection between the data controller and the data subject, based on the data subject's application. The data controller may also process the personal data in order to demonstrate compliance with statutory obligations related to the selection of employees and to prepare and present a legal claim or to defend it. The data controller ensures that the processing performed on this basis is proportionate to the data subject's benefits and meets their reasonable expectations.
- Consent: Legislation may also require Faron to acquire applicant's consent for processing of certain type of personal data or for conducting of certain processing activities. Consent acts as a basis for processing of personal data e.g., when the data controller asks the data subject to participate in certain recruitment assessments or asks the data subject to authorize the necessary background studies. With the consent of the data subject, the open application submitted by him/her can be used when searching for suitable candidates for open positions based on the applications submitted to the recruitment system.

Actions preceding the conclusion of a contract: For some parts, processing of the personal data is also necessary for the purpose of preparing the employment contract with the selected applicant.

### **5. Types of Personal Data**

Categories of personal data which is processed:

- a. Information necessary for identifying applicants such as e.g., name, contact details (email address, telephone number etc.) typically processed in the application phase;

- b. Background information typically processed includes information on education and degrees, previous work experience, language skills, competencies, CV and cover letter as well as any other appendices like LinkedIn profile or similar (only necessary information for the recruitment process);
- c. Other information related to the recruitment, such as information concerning a possible interview, communication between the data controller/Faron and the data subject/applicant, possible video interview, suitability questionnaires and self-evaluation records;
- d. Potential other similar and relevant application-related information such as applicant assessment reports by recruitment consultants;
- e. Additional information like first names, nationality, gender and other similar information disclosed by the applicants; and
- f. Subject to the applicable laws and applicant's consent, background check information, such as information obtained through security clearances or similar information sources (from applicant selected for the position).

## **6. Regular Sources of Data**

Faron processes personal data and information primarily from application which has been provided by job applicant i.e., data subject himself/herself during the filling of the application. The applicant may also provide additional information e.g., by phone to the person handling his/her application.

Subject to the applicant's consent, information may also be obtained from recruitment consultants interviewing applicant and handling applicant's assessment as a part of the recruitment process or from referees provided by the applicant. Also, subject to the applicable laws and applicant's consent, information may be obtained and updated from the data files of third parties through background checks, security clearances and other similar information sources deemed necessary due to the nature and security requirements related to the open position in question (e.g., credit information register controllers within the limits permitted by law).

## **7. Storage Period of Data**

Faron is actively processing the personal data of the applicants during the recruitment process. After the recruitment process has ended, Faron passively retains the personal data for pre-defined time periods based on Faron's genuine need and legislative requirements Faron is subject to. Faron will retain the data after the recruitment process has been completed for as long as necessary for implementing the rights and obligations of Faron and responding to potential claims, but no more than 12 months from the date of recruitment decision has been made unless the applicant requests the deletion of his/her personal data before this. With the data subject's consent, personal data can also be stored for a period of time mentioned when giving the consent for future recruitment

processes. For more information regarding the retention times, you may contact Faron by using the contact details provided in section 13.

If an applicant is chosen for the positions, the basic information of the respective applicant as well as other information relevant for the employment relationship shall be transferred to Faron's employee information data files. The retention times concerning Faron's employee information data files are available in the respective Privacy Notice made available to Faron employees.

## **8. Regular Disclosures of Data**

Personal data may be disclosed to Faron's Group companies for purposes compatible with the processing purposes defined in section 4 of this Privacy Notice. Some of these entities may be located outside of EU/EEA countries.

Faron may from time to time also use such third parties like e.g., external recruitment consultants in recruitment or other suppliers of services used in recruitment. These parties also from time to time process the personal data only to the extent that is needed for the recruitment process managed by Faron described in this Privacy Notice. Faron only uses proven reliable service providers and subcontractors and has personal data processing agreements with the data processors.

## **9. Data Transfers from EU/EEA**

Personal Data may be transferred outside the European Union (EU) or the European Economic Area (EEA), when Faron as a data controller ensures that sufficient level of data protection is maintained through appropriate safety measures, e.g., EU commission's model clauses (SCC's; Standard Contractual Clauses) or according to the adequacy decisions set by the European Commission or using some other transfer mechanism in accordance with applicable legislation. More information of such international data transfers and applied safeguards may be received by using the contact details provided in section 13.

## **10. Data Security**

Faron processes personal data securely and according to applicable laws. It has protected the data appropriately in technical and organisational terms. The data are stored appropriately on secure servers with technical data security that is controlled by different means and the access to the data is managed by job role-based management of access rights. If printouts are taken the persons handling the recruitment process at Faron are responsible for secure processing of such manual material and destroying the material when no longer needed in connection with relevant recruitment process. Access to materials is limited only to those persons who need to process such information and personal data as part of their duties in Faron.

## **11. Automated decision making**

Personal data will not be used for such automated decision-making in the recruitment process that might have legal or corresponding effects on the data subject.

## **12. Data Subject's rights**

### **a. Data subject's right to object personal data processing**

When the personal data processing is based on the data controller's legitimate interest (only), the data subject is entitled to object the processing of his/her personal data on grounds relating to his/her situation. Data subject may send his/her request to object the processing in accordance with section 13 of this Privacy Notice. In this request, the data subject shall define the particular situation based on which data subject is objecting the data processing. Faron may decline the request on statutory grounds.

### **b. Data subject's right to access**

Data subjects have the right to receive the data controller's confirmation of whether their personal data is processed or not. If the data controller processes a data subject's personal data, the data subject has the right to receive information in this Privacy Notice and a copy of the personal data being processed or already processed. Data subject is entitled to obtain information of the personal data concerning him/her which Faron is processing and obtain a copy of such personal data. Request for access may be presented to Faron in accordance with the section 13 of this Privacy Notice.

### **c. Right to rectification, erasure, restriction of data and right to object**

Data subject is entitled to have any such personal data that is inaccurate, outdated, unnecessary or contrary to the purposes of data processing corrected or erased. The data subject also has the right to demand that data controller restrict the processing of his/her personal data or otherwise right to oppose the processing of his/her personal data. Requests concerning these rights may be presented in accordance with the instructions in section 13 of this Privacy Notice.

### **d. Right to data portability**

The data subject may request that data he/she has provided himself/herself be transferred in machine-readable format.

### **e. Right to cancel prior consent**

If the data controller processes the data subject's personal data based on consent, the data subject has the right to cancel such consent. The cancellation of consent does not affect the lawfulness of processing performed based on the consent prior to its cancellation.

**f. Right to lodge a complaint**

If the data subject considers that data controller does not follow the applicable data protection regulation, a data subject has the right to lodge a complaint with the competent data protection authority.

Generally, Faron does not charge the data subject for using his/her rights presented in this section 12 (a-e). However, Faron may, at its sole discretion, (a) refuse to fulfil; or (b) charge a reasonable fee for fulfilling of several similar consecutive data subject's access requests that are manifestly unfounded or excessive. Faron is also entitled to decline requests on statutory grounds.

### **13. Contacting the Data Controller**

In all questions and matters relating to personal data processing of rights of the data subject, data subject can contact Faron. Data subjects may use their rights by email to [hr@faron.com](mailto:hr@faron.com)

Contact details:

**Faron Pharmaceuticals Oy**

**Attention: HR**

Joukahaisenkatu 6

20520 Turku

Finland

The data subject shall attach the following information to his/hers request (according to Section 12 a, b, c, or d): information that can be used to identify the data subject (such as e.g., full name, email address or similar), information in which role the data subject is contacting Faron (e.g., recruitment candidate), information about which of the data subject's legal rights mentioned above in section 12 the data subject wish to use.

Faron retains the right to change and update this Privacy Notice as required.