

RECRUITMENT PRIVACY NOTICE

1. What is the purpose of this document?

biomodal, or affiliated subsidiaries, referred throughout this notice as “**biomodal**”, “**we**”, “**us**”, “**our**”) respects your privacy and is committed to protecting your personal data.

This privacy notice describes how we collect and use personal data about you during your potential employment with us, in accordance with applicable data protection law.

This notice applies to all applicants:

located in the United Kingdom (“**UK**”) and European Economic Area (“**EEA**”), where you would be employed by Biomodal in the UK; and if you are located in the United States (“**US**”), where you would be by Biomodal’s US subsidiary.

biomodal is a “controller” of your personal data. This means that we are responsible for deciding how we hold and use personal data about you.

This notice does not form part of any potential contract of employment with you. It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using that data and what your rights are under the applicable data protection law.

2. Changes to this privacy notice

We may update this notice from time to time but if we do so during the hiring process, we will inform you and provide you with access to the new version. We may also notify you in other ways from time to time about the processing of your personal data.

3. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your application for employment with us.

4. Contact information

Biomodal is a company registered in England and Wales, with company number. Our registered office is at Biomodal, Chesterford Research Park, Cambridge CB10 1XL.

We have appointed a Data Protection Officer (“**DPO**”) to oversee compliance with this notice. If you have any questions about this notice or how we handle your personal data, please contact the DPO at James Leaton Gray <jlg@theprivacypractice.co.uk>;

5. Personal data that we process about you

“Personal data” means any information about a person, from which that person can be directly, or indirectly, identified. It does not include data where the person's identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as data about a person's health or criminal convictions.

We will process the following categories of personal data about you:

- **Identity:** full name, title, photograph, date of birth, gender, pronouns, nationality, links to personal social media, copy of government identification (e.g. passport), residential address, email address and telephone number.
- **Recruitment:** copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process.
- We may also process the following more sensitive types of personal data (referred throughout as “**Special Category Data**”):
 - Disability and related health data where we need it to understand what reasonable adjustments we would need to make for your working environment and any employment with us.
 - Information about criminal convictions and offences, following a basic DBS check.
 - You may voluntarily give us data for aggregation about your race, gender, religion, and sexual orientation.

6. How your personal data is collected

We collect personal data through the application process, directly from candidates during employment or third-parties, such as recruitment agencies or a basic criminal background check provider. We may sometimes collect additional information from third parties, such as former employers or credit reference agencies.

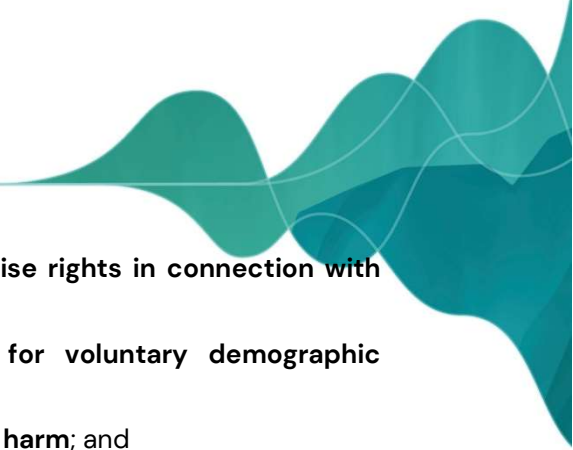
7. Lawful bases for processing your personal data

Under applicable data protection law, we need a legal justification to process your personal data.

We process the personal data listed above to allow us to:

- (i) processing **necessary to perform a contract** or to take steps at your request, before entering a contract and **enable us to comply with our legal obligations**;
- (ii) **pursue our legitimate interests as a business**, provided your interests and fundamental rights do not override those interests; and

We will only process Special Category Data:



- (iii) where we need to carry out our legal obligations or exercise rights in connection with employment;
- (iv) where you have given explicit consent (for example for voluntary demographic questionnaires);
- (v) where it is necessary to protect you or another person from harm; and
- (vi) where it is needed in relation to legal claims.

8. Purposes of processing

In the table below, we have indicated the purposes for which we will process your personal data and Special Category Data, as well providing our legal justification for the processing and a description of which categories of data are involved. Some of the above grounds for processing will overlap and there may be several grounds which justify the processing.

Purpose for processing	Legal justification
Making a decision about your potential recruitment or appointment.	<p>(i) – processing necessary to perform a contract or to take steps at your request, before entering a contract</p> <p>(iii) – the purpose is within our legitimate business interests.</p>
Assessing what reasonable adjustments would need to be made to your working environment if you were to work with us.	(i) Processing is necessary for the assessment of the working capacity of the employee.
Checking you are legally entitled to work in your country of residence.	<p>(i) – processing necessary to perform a contract or to take steps at your request, before entering a contract</p> <p>(ii) – complying with our legal obligations as a business.</p>
Uploading information to Fenix’s HR platform, to allow us to administer a fair recruitment process.	<p>(i) – processing necessary to perform a contract or to take steps at your request, before entering a contract</p> <p>(iii) – the purpose is within our legitimate business interests.</p> <p>(v) – where we need to carry out our legal obligations or exercise rights in connection with employment.</p>
Considering whether it would be possible to employ you with the following benefits: flexible working	<p>(i) – processing necessary to perform a contract or to take steps at your request, before entering a contract (v) – where we need to carry out our legal</p>

working abroad	obligations or exercise rights in connection with employment.
Data hosting / creating back-ups of Biomodal IT systems.	(iii) - the purpose is within our legitimate business interests.
Dealing with legal disputes involving you, or other contractors or employees.	(i) - processing necessary to perform a contract or to take steps at your request, before entering a contract (iii) - the purpose is within our legitimate business interests. (vii) - where it is needed in relation to legal claims.
To prevent fraud.	(iii) - the purpose is within our legitimate business interests.
If we reasonably believe that you or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being.	(i) - processing necessary to perform a contract or to take steps at your request, before entering a contract (iii) - the purpose is within our legitimate business interests. (v) - where we need to carry out our legal obligations or exercise rights in connection with employment. (vi) - where it is necessary to protect you or another person from harm (vital interests).

9. Consent

In limited circumstances, we may approach you for your written consent to allow us to process personal data (including Special Category Data). If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. If we ask for your consent, you do not need to provide it and you will not receive detrimental or unfavourable treatment if you do not wish to consent, or later withdraw your consent. Please see **Section 18 (right to withdraw consent)** for further information on withdrawing your consent.

10. Information about criminal convictions

We may collect information about criminal convictions as part of the recruitment process through a basic DBS check. We will use information about criminal convictions and offences to determine whether to enter into employment with you.

11. If you fail to provide personal data

Please note that if you fail to provide certain personal data when requested, we may not be able to offer you employment.

12. Data sharing

We will share your personal data with third-party service providers and other entities in our group of affiliated companies where required by law, where it is necessary to administer the contractual relationship with you or where we have another legitimate interest in doing so.

We will share your personal data with third-party service providers, such as:

- service providers that are relevant to your recruitment (such as criminal background check providers and credit reference agencies);
- our IT service providers (such as data hosting / creating back-ups of Biomodal IT systems);
- our professional advisers (such as lawyers and accountants);
- relevant third parties in the event of a possible sale, merger, acquisition, business reorganisation or group restructuring exercise;
- law enforcement authorities; and
- government agencies, bodies or regulators.

We may share your personal data with other entities in our group of affiliated companies for the purposes of integrating our HR platform globally and for business administration, management and planning purposes (e.g. day-to-day administration in connection with your role, periodic reporting activities on company performance and in the context of a business reorganisation or group restructuring exercise).

13. Transferring information outside the United Kingdom (“UK”) and the European Economic Area (“EEA”)

We share your personal data within our group of affiliated companies. This will involve transferring your data outside of the UK and the EEA.

Some of our external third parties are based outside the UK and the EEA so their processing of your personal data will involve a transfer of data outside the UK and the EEA.

Whenever we transfer your personal data out of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- We will use specific contracts approved for use in the UK and the EEA which give personal data an essentially equivalent level of protection that it has in the UK and the EEA.
- Where one of a number of specific derogations / exemptions applies under applicable data protection laws.
- Further information about these measures is available from the DPO, who can be contacted using the contact information located at **Section 4 (contact information)** of this notice.

14. Non UK/EU applications

Where applicants are not from the UK or an EU country Biomodal will abide by local data Privacy laws. This obviously also applies to US applicants from States with Privacy legislation such as the Californian CCPA.

15. Data retention

In most cases, we will retain your personal data for 6 months after the completion of the recruitment round in which you participated. However, we may need to hold the data for longer if we have an appropriate basis in law (including, but not limited to, compliance with applicable laws and regulations).

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

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.
- The applicable legal requirements.

In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we may use that information without further notice to you.

16. Your rights in connection with personal data

Under certain circumstances, you have the right to:

- **Request access** to your personal data (commonly known as a data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data 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 data. This enables you to ask us to delete or remove personal data where there is no legitimate reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest for the processing and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of some sections of your personal data to another party.

If you would like to exercise your rights in relation to your personal data, please make a request to the DPO in writing using the contact information located at **Section 4 (contact information)** of this notice.

17. What we may need from you before we can deal with your request

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

18. Right to make a complaint

You have the right to make a complaint at any time to a data protection regulator with respect to data protection issues. If you are based in the UK or the US, you may wish to contact the UK's Information Commissioner's Office (ICO). If you are located in the EEA, this will be your local country or state-specific data protection regulator.