



## **Job Application and Recruitment – Information Notice**

Otsuka Pharmaceutical Europe Limited and its affiliates (“Otsuka”) respects your right to privacy.

The data controller of your personal data is Otsuka Pharmaceutical Europe Ltd which is registered with the Information Commissioner’s Office with registration number Z9584844.

Your personal data will be processed according to applicable legislation, including the Data Protection Act 2018 and the UK GDPR. You should read this Notice, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it. You should also read any other Notices that we give you, that might apply to our use of your personal data in specific circumstances from time to time.

### **What is the scope of this Notice?**

In this Notice, when we talk about personal data, we mean any information that relates to an identified or identifiable person – in this case, you. It applies to job applicants, whose personal data are processed during recruitment and pre-employment screening activities.

Please be aware that we have a separate Notice, which deals with the processing of personal data related to employees in an employment context.

### **What personal data does Otsuka collect?**

We may collect personal data about you from a variety of sources, including directly from you (for example, when you share your CV with us directly or you apply for a position, which is advertised on social media or other recruitment platforms); and from other sources, such as recruitment agencies or third parties who assist us in pre-screening activities.

Otsuka may collect and use some or all of the following categories of personal data for the purpose(s) described below:

- **Basic information** – your name (including prefix or title), gender, age or date of birth;
- **Contact information** – information you provide to us that allows us to contact you, for example your personal or business email, mailing address, telephone number, and profile on a professional social media platform;
- **Professional information and experience** – information related to your education, work experience, references and referees;
- **National identifiers** – your national ID/passport, residence and work permit status, social security number, or other taxpayer/government identification number;
- **Financial information** – your salary, retirement account information, company allowances, bonus, benefits, working time records, and taxpayer reference number (e.g. tax

identification number, national insurance number, social security number). We will also collect your bank details if we reimburse you for expenses during the recruitment process.

- **Information collected during interviews** – comments noted by our interviewers and audio/video recordings of the interview (in case of telephone interviews or video-enabled interviews).
- **Background information** – education and academic information as well as professional qualifications. If we want to offer you the job, we may need to complete pre-employment screening. We may then also collect additional background information such as credit history, criminal records and occupational health information (if permitted by law).
- **Special categories of personal data** – information related to your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, or information about your health, disabilities or sexual orientation. We use this information to make sure we meet relevant laws. If we offer you employment, we may also ask you for information about your health (physical or mental) so we can give health and insurance benefits to you and your dependents. We will also use this information to discuss with you what reasonable adjustments we can make for you. We want to make sure we can provide an inclusive workplace.

Special categories of personal information will only be collected if strictly necessary and legally permitted. If we ask you for special categories of personal information, you can decide whether to share this information. If you decide not to share these with us, please be assured this does not affect your application.

#### **For what purpose does Otsuka process personal data and what is the legal basis?**

We process the personal data listed above for the following purposes and legal bases, which may vary depending on where you live and where we operate:

<b>Purpose</b>	<b>Legal basis</b>
<b>To consider your application, including:</b> <ul style="list-style-type: none"> <li>- Replying to your application;</li> <li>- Assessing your suitability for the role;</li> <li>- Creating a candidate profile;</li> <li>- Evaluating job applicants and creating a shortlist; and</li> <li>- Conducting interviews.</li> </ul>	<b>Consent for processing</b> (Art. 6 (1) a) where you have given us your permission when such permission is obligatory. You can withdraw your permission at any time.  <b>Processing is necessary for the performance of a contract</b> (Art. 6 (1) b) for example, before entering an employment contract or perform an employment contract.
<b>For pre-employment screening, including:</b> <ul style="list-style-type: none"> <li>- Conducting cognitive tests or personality assessments or other suitability evaluations, fitted to the corresponding open position;</li> <li>- Performing background or employment checks (when applicable and legally permitted); and</li> <li>- Verifying your identity, academics or qualifications in relation to your application.</li> </ul>	
<b>To include you in our talent pool, including:</b>	

<ul style="list-style-type: none"> <li>- Considering you for current or future opportunities in any of the Otsuka Companies and Affiliates; and</li> <li>- To let you know about opportunities or ask you for updates to your profile.</li> </ul>	<p><b>Compliance with a legal obligation</b> (Art. 6 (1) c) for example, employment, social security and occupational health laws and regulations.</p>
<p><b>To manage and improve our recruitment process, including:</b></p> <ul style="list-style-type: none"> <li>- Managing our network and information systems security;</li> <li>- Keeping records related to our hiring processes;</li> <li>- Measuring the recruitment process against our aspirations to ensure we are adhering to fair employment practices;</li> <li>- Evaluating our progress in achieving our diversity hiring goals to ensure equal opportunity monitoring and reporting; and</li> <li>- Preparing and performing management reports and analysis related to the recruitment process.</li> </ul>	<p><b>Processing is necessary to protect your vital interests</b> or those of others (Art. 6 (1) d).</p> <p><b>Processing is necessary for purposes of legitimate interests</b> pursued by us (Art. 6 (1) f) for example, it is in our interests in considering you as a candidate for current and future employment opportunities. This does not apply if our legitimate interest is overridden by your interests or fundamental rights and freedoms.</p>
<p><b>To achieve other purposes, including:</b></p> <ul style="list-style-type: none"> <li>- Following applicable laws and regulations;</li> <li>- Responding to requests from competent public authorities;</li> <li>- Telling you about changes to our terms, conditions and policies;</li> <li>- Exercising or defending ourselves against potential, threatened or actual litigation;</li> <li>- Protecting our vital interests, your vital interests, or those of another person;</li> <li>- Providing work related accommodations or health and insurance benefits to you and your dependents; and</li> <li>- Responding to and handling your queries and requests.</li> </ul>	

### Who does Otsuka share my personal data with?

We disclose your personal data to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process personal information for purposes that are described in this Notice or notified to you when we collect your personal data;
- to any **competent law enforcement body, regulatory, trade association, government agency, court or other third parties** where we believe disclosure is necessary (i) as a

matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights (on the basis of our interest in the defence of our rights), or (iii) to protect your vital interests or those of any other person;

- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Notice (on the legal basis of our legitimate interest in ensuring the business operation);
- to any **other person with your consent** to the disclosure.

These recipients of your personal data may be acting on our behalf or as data controllers in their own right.

### **How does Otsuka keep my personal data secure?**

We use appropriate technical and organisational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the categories of personal data processed.

### **International data transfers**

We may transfer your personal data to other Otsuka group companies, service providers and partners located outside of the United Kingdom or the European Economic Area (“**EEA**”) (as appropriate), for example in the USA or Japan. Please note that countries outside of the United Kingdom or the EEA may not provide the same level of protection for your personal data. Where we transfer your personal data outside of the United Kingdom or the EEA, we ensure that appropriate safeguards are put in place and that all transfers of your personal data comply with applicable data protection laws.

The appropriate safeguards that Otsuka uses are based on the model clauses approved by the Information Commissioner’s Office and the European Commission. To find out more about how we safeguard your information in relation to data transfers outside the United Kingdom or the EEA, please contact us using the details in the ‘How to contact us?’ section below.

### **How long will my information be kept?**

We retain personal data we collect from you for 6 months after the application and recruitment process has ended for the purposes listed above. In limited circumstances, we may need to retain your personal data for longer because of legal or regulatory requirements.

### **Your rights**

You have a number of rights, which apply to our use of your personal data. The availability of these rights depends upon our lawful basis for processing your personal data and your rights may also be subject to certain conditions and restrictions. In general, these rights are:

<b>Right</b>	<b>What does this mean?</b>
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how your information is used and your rights. This is provided in this Notice or through other avenues (such as when you contact us via telephone).

2. The right of access  
You have the right to obtain access to your information (if an organisation is processing it), and certain other information.
3. The right to rectification  
You are entitled to have your information corrected if it is inaccurate or incomplete.
4. The right to erasure  
This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for an organisation to keep using it. This is not a general right to erasure; there are exceptions (for example, where you have provided consent to processing, this applies only where you have withdrawn your consent, if we are processing in connection with performance of a contract or for compliance with law, such as these circumstances (i.e. pharmacovigilance, medical information requests and product quality complaints), this applies only where such data are no longer necessary. Where we are relying on our legitimate interests this applies only if there are no overriding legitimate interests).
5. The right to restrict processing  
You have rights to 'block' or suppress further use of your information in certain circumstances. When processing is restricted, the relevant organisation can still store your information, but may not use it further. Please note that your right to restrict processing is limited in certain situations; for example, when we are processing personal data that we collected from you with your consent, you can only request restriction on the basis of inaccuracy of data or where our processing is unlawful and you don't want your personal data erased or you need it for a legal claim. You do not have this right where we are processing your personal data for compliance with law, such as these circumstances (pharmacovigilance, medical information requests and product quality complaints).
6. The right to data portability  
You have rights to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances, which do not include where we are processing on the basis of legitimate interests or for compliance with law.

**7. The right to object**

**You have the right to object to certain types of processing, in certain circumstances such as when we rely on our legitimate interests.**

Where your personal data is processed on the basis of your consent, you have the right to **withdraw your consent** at any time. If exercised, this will not affect the lawfulness of processing prior to withdrawal.

You also have the right to **complain to a data protection authority** about our collection and use of personal data. For more information, please contact your local data protection authority. A list of data protection authorities in the European Economic Area is available here [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

**How to contact us?**

Should you have any questions in regards to the protection of your personal data or if you wish to exercise your legal rights, please submit your query [here](#) or contact Otsuka by emailing: [privacy@otsuka-europe.com](mailto:privacy@otsuka-europe.com).