

Privacy Notice for Job Applicants May 2024

1. Introduction

Microbiotica Limited is an emerging biotechnology company launched to commercialise groundbreaking research conducted into the role of the human microbiome in health and disease at the Wellcome Trust Sanger Institute. The company is based at Chesterford Research Park near Cambridge UK.

From time to time, the company seeks new recruits to join its team. In order to match applicants to opportunities, Microbiotica uses personal information provided by applicants through CVs and letters, either directly or via recruitment companies.

Microbiotica is committed to ensuring that your privacy is protected and to complying with the EU General Data Protection Regulation and the UK GDPR which replaces the Data Protection Act. This Privacy Notice sets out how Microbiotica uses, processes and protects any information that you give us..

2. What we collect and why

Microbiotica holds personal information from applicants, which may include:

- Contact information such as your name, email address, postal address, telephone number
- Information on your application such as your qualifications, skills, career experience and other professional data
- Information on our interactions such as other personal information which you have provided to us during interviews, meetings, on phone call and in other correspondence with us
- Information on our offer of employment, such as information on our terms of agreement
- Publicly available information, such as your educational and employment history or any other information that is publicly available.

The personal data is generally collected from you directly or from professional business partners that work together with us, such as recruiting agencies. We may however collect personal data from publicly available sources, such as from professional social networks, such as LinkedIn.

Lawful basis for processing

We will collect your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process your personal data for the following purposes:

- To assess, process and manage your application (eg, verifying the information you have provided, assessing your suitability for the desired position and conducting interviews). Our processing of your personal data necessary to take the required steps at your request prior to entering into an agreement with you (whether as an employee or in another capacity). In addition, processing of your personal data is necessary to serve our legitimate interests in a professional recruitment process.
- Entering into and fulfilling contractual obligations (eg, meeting our contractual obligations, including payment obligations). Our processing of your personal data is necessary to enter into an agreement. In addition, we may be legally required to keep certain personal data (eg, for tax reporting and transparency requirements).

• Keeping our company safe and secure (eg, fraud prevention, CCTV and security reporting). Our processing of your personal data is necessary to serve our legitimate interests of keeping our company and our systems, services and products safe and secure.

3. How we store your data

We store information provided by applicants in our email system and on file in our cloud-based storage, held on UK servers. The company will at some point in the future be moving all its cloud-based storage to a hosted physical server in the UK. For convenience through the review stages of recruitment, we may also print hard copies of applications and will keep these securely locked away when they are not being reviewed.

When applications are forwarded to us via recruitment companies, we store the information provided in the same way as any applications sent directly to us.

4. Who has access to your information

The information provided by you in your application will be accessed by the HR Operations Coordinator and the VP Operations who together oversee company recruitment, the recruiting line manager and, on occasion and when appropriate, other members of staff including member of the senior management team.

Authorities: we share your personal data with authorities and regulatory bodies to the extent this is required under applicable laws, legally binding orders or regulatory guidance. We may also transfer personal data to authorities to protect our rights and property, or the rights and property of third parties, for instance in case of legal proceedings;

Service providers: we use third party service providers to help us achieve the purposes set out in this Privacy Notice. We require our service providers to respect the security and confidentiality of your personal data and to process personal data in accordance with applicable laws;

Business transfers: we may sell, transfer or otherwise share some or all of our business or assets, including personal data, in connection with a business transaction (or potential business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. We will you inform you of such business transfers in accordance with applicable laws.

5. Data security

Microbiotica is committed to ensuring that your information is held securely at all times. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure the information we collect and store. Where we work with recruitment companies, we will check that they comply with the General Data Protection Regulation before signing an agreement to use their services.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data as it is transmitted to us via email.

6. Controlling your personal information and your rights

We will keep your information on file for up to six months. At this point we will delete/destroy your information, unless we wish to retain your information for longer, in which case we will seek your consent.

We will not give, sell, distribute or lease your personal information to any third parties unless we have your permission or are required by law to do so.

Your rights in relation to our processing of your personal data

You have the following rights in relation to your personal data, in accordance with applicable data protection laws:

- The right to information and to access your personal data;
- The right to request the rectification, restriction, erasure or portability of your personal data;
- The right to object to our processing of your personal data; and
- The right to submit a complaint with a data protection authority.

If you want to exercise any of the above rights, please contact us at <u>info@microbiotica.com</u>, you can also contact our Data Protection Officer at <u>microbiotica.dpo@mydata-trust.info</u>

If you are not satisfied with any response you may receive regarding a concern about your personal information or about a complaint, you have the option of contacting the Information Commissioners Office to take that complaint further.

<u>The Information Commissioners Office</u> *Address:* Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, UK *Telephone:* 0303 123 1113 (local rate) or 01625 545 745 (national rate) *Website:* www.ico.org.uk *Email:* casework@ico.org.uk *Microbiotica Registration Reference:* ZA237648

Microbiotica Limited may change this policy from time to time. An up to date policy will always be available on request. We encourage you to periodically review this Privacy Notice to learn how we use your personal data.