

## Privacy Notice – Job Applicants UK and Ireland

This privacy notice applies to people who apply for jobs located in Ipsen UK and Ireland. It tells you what to expect when Ipsen collects and processes personal information about you.

Ipsen Pharma SAS, based 65, quai Georges Gorse – 92100 Boulogne-Billancourt and Ipsen Limited, 190 Bath Road, Slough, SL1 3XE, Ipsen Biopharm Ltd, Ash Road, Wrexham LL13 9UF, Ipsen Bioinnovation Ltd, 102 Park Dr, Milton, Abingdon OX14 4RY and Ipsen Pharmaceuticals and Manufacturing Ltd, Blanchardstown Industrial Park, Snugborough Rd, Blanchardstown, Dublin, Ireland are the data controllers for applicant data. In some cases, and where appropriate, a third party may be the data controller for processing your data.

Our application system also provides privacy information to applicants. Their privacy notice is available on the applicant system and should also be read to understand how we process your personal data when you apply for a job and before successful applicants start at Ipsen.

### **Data collected**

We collect personal information about you when you enter your details or upload your CV and other information about yourself when applying for a job. We also collect data about applicants from recruitment agencies and from systems like LinkedIn or other online systems that support recruitment.

The personal data process for applicants may include:

- Name and contact details, including email, phone number, home address
- Academic and professional qualifications
- Information about your skills and expertise
- Information about your work history and your salary expectations
- Your right to work in the UK or Ireland
- Details about your most recent employer and or referees

If we arrange an interview with you, you might be asked if you need us to make any special arrangements for your interview, which might mean you disclose some sensitive data about yourself.

We will also record information about your responses during interviews. We might also hold information about any assessments or tasks we ask you to complete during the application process.

If you are successful, we will record details of your offer. If you accept a role with us, we will then load your data onto our HR system. Before you start at Ipsen, we will ask you to complete background checks, during which we may collect the following:

- Information about your health
- Identify checks documents, i.e. a copy of your passport
- Where appropriate, other background checks
- And where your role requires it, checks on any criminal convictions

## Purpose and legal bases of data processing

Depending on the processing activity, we rely on the following lawful bases for processing your personal data.

Legal basis	Purposes
Article 6 1 (b) <b>Contract</b>	<p>We rely on article 6 1(b) of GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract, for the following:</p> <ul style="list-style-type: none"><li>• We collect and use your information to process your application, to make decisions about shortlisting and to contact you during the application process. We will also share data with any third parties that may be assisting us with the recruitment process.</li><li>• We may ask you to complete assessments or tasks during the application process and we will keep data about that to help us to make a decision.</li><li>• If you are offered a post, we will process your information to make you an offer. We will also set you up on our systems.</li><li>• We might use your contact details to send you messages and meeting invitations before you start.</li><li>• If you accept our offer, we will use your information to set up your contract, make organisational arrangements and share your data with any third parties that work with us to provide any benefits.</li></ul>
Article 6 1 (c) – <b>legal obligation</b>	<p>We will rely on Article 6 1 (c) to comply with our legal obligations, and the Equality Act, to process any information you provide to us to make any reasonable adjustments you might need during the recruitment process.</p>

Where we process **special category personal data** about you, we do so in line with the relevant conditions for processing this type of data in Article 9 of GDPR, which are:

Condition for processing	Purposes
Article 9 2 (b) <b>Employment and social security and social protection law</b>	<p>We will rely on Article 9 2 (b), in relation to employment to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information including, for example:</p> <ul style="list-style-type: none"><li>• collecting ethnicity data, which we use in aggregated form monitor equality</li><li>• to check your right to work in the country</li><li>• to carry out background checks on your health as relevant to your role</li><li>• to make special arrangements for your interview</li></ul>

## **Data recipients**

Information related to you will only be accessed by approved HR, the hiring manager or other relevant managers, IT and only others who have a legitimate need to access your information.

Your personal information is shared with relevant staff in other entities in the group where necessary and with third parties who process data on behalf of Ipsen within the scope of the purposes mentioned in this Notice.

It is Ipsen policy to ensure that the third parties we use adequately protect the information entrusted to them. Where third parties process data on our behalf, they will be bound by contract clauses in accordance with GDPR, as appropriate to our respective roles. Ipsen will only provide those companies the personal data they need to deliver the service. We work with third parties in relation to recruitment and starting up relationships with new starters, for the following types of activity:

- Recruitment agencies assisting with aspects of the recruitment process
- Technology providers processing recruitment data
- Systems to support interviewing
- Background check providers

Ipsen does not sell, rent or lease your personal data.

## **Term of retention**

Your personal data will be retained in line with Ipsen's Global Retention and Archiving guidance and local additional guidance for the UK and Ireland. It is the policy at Ipsen not to keep your personal data for longer than necessary to fulfil the purpose for which it was collected and to meet any legal or regulatory provision requiring otherwise.

## **International transfers of data**

Your personal data may be processed by service providers or companies affiliated with Ipsen in non-EU countries which do not ensure an adequate level of protection to personal data. In order to ensure that your personal data are protected, Ipsen will, where necessary, ensure that the recipient has entered into data transfer agreements which include the EU Commission's standard contractual clauses.

Within the Ipsen Group, countries have signed an Intra-Group Agreement, which provides standard contract clauses to allow us to transfer personal data across countries within the company.

## Your rights

You may have the following rights regarding your information depending on the circumstances and applicable legislation:

Right	What does this mean?
<b>1. The right of access</b>	You have the right to obtain access to the information processed by Ipsen.
<b>2. The right to rectification</b>	You are entitled to have your information corrected if it is inaccurate or incomplete.
<b>3. The right to erasure</b>	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 Ipsen to keep using it. This is not a general right to erasure; there are exceptions.
<b>4. The right to restrict processing</b>	You have rights to ‘block’ or suppress further use of your information in certain circumstances. When processing is restricted, Ipsen can still store your information, but may not use it further.
<b>5. The right to data portability</b>	You have rights to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances.
<b>6. The right to object</b>	You have the right to object to certain types of processing, in certain circumstances.

## How to contact us

For more information on your rights, if you would like to exercise any of these rights, or if you are unhappy with how your information has been handled, please contact [Michael.Spiers@ipsen.com](mailto:Michael.Spiers@ipsen.com) in the first instance.

If you have any concerns about this Privacy Notice, please feel free to email the UK and Ireland Data Privacy Manager at [dataprivacyUKI@ipsen.com](mailto:dataprivacyUKI@ipsen.com) or the Global DPO on [dataprivacy@ipsen.com](mailto:dataprivacy@ipsen.com).

If you are not satisfied with the response to any issues, would like to make a complaint or believe the processing of your information does not comply with data protection law, you can make a complaint to the relevant data supervisory authority. This is the Information Commissioner’s Office (ICO) for the UK and the Data Protection Commission (DPC) for Ireland.