PRIVACY NOTICE FOR JOB APPLICANTS

Last update: January 2026

1. Data Controller & DPO

Under the UK General Data Protection Legislation (UK-GDPR), the body that determines how and why your personal data is processed is defined as the "controller". The controller (hereinafter termed: the Company) of your personal data is:

Lupin Healthcare (UK) Ltd
The Urban Building
3-9 Albert Street
Slough
SL1 2BE
United Kingdom
+44 (0) 1565 751 378 | Option 7 or ext:210
annagillard@lupin.com

You can contact our external company data protection officer here:

The Data Protection Officer:

Bird & Bird DPO Services SRL
Avenue Louise 235 b 1
1050 Brussels, Belgium
E-Mail : dpo@lupin.com

2. Introduction

Dear Applicants,

We, Lupin Healthcare (UK) Ltd. (the "Company"), respect you and are committed to honoring and safeguarding your privacy. The Company is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

During the recruitment process, the Company collects and processes personal data relating to job applicants.

The Company is committed to being clear and transparent about how it collects and uses that data and to meeting its data protection obligations.

3. Data Protection requirements

The Company will comply with data protection law. This means that the personal information we process about you must be:

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
3. Relevant to the purposes we have told you about and limited to those purposes only;
4. Accurate and kept up to date;
5. Kept only for such time as is necessary for the purposes we have told you about; and
6. Kept securely.

4. What information does the Company collect and process?

The Company collects and processes a range of personal information (personal data) about you. Personal data means any information about an individual from which the person can be identified. The detailed list can be found in the Annex.

We may also collect the following special categories of more sensitive personal information:

a) information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments, in accordance with local labor law
b) information about your criminal record in accordance with UK applicable regulations; and
c) equal opportunities monitoring information, including information about your health and religion or belief in accordance with UK applicable regulations.

The Company collects this information in a variety of ways during the application and recruitment process. In some cases, the Company collects personal data about you from third parties in accordance with local labor law, such as references supplied by former employers**,** information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law**.**

Data is stored in a range of different places, including on your application record, in the Company's HR systems and in other IT systems (including the Company's email system).

5. What information for what purpose and on what legal basis does the company collect and process personal data?

The Company processes your personal data for the following purposes and only where it has a legal basis to do so. For more information, please see the Annex.

Performance of a contract

The Company needs to process data prior to entering a contract with you. We also need to process your personal data to enter an employment contract with you and to meet our obligations under that employment contract.

Necessary for compliance with a legal obligation

In addition, the Company needs to process data to ensure that we are complying with our legal obligations. For example, we are required to check an employee's entitlement to work in the country using your nationality ID information.

For certain positions, it may be necessary to carry out criminal records checks to ensure that individuals are permitted to undertake a particular role. The level of checks would depend on the role, and we will only process your criminal record information for this purpose where authorized by law which provides for appropriate safeguards of your rights and freedoms.

The Company processes health information if we need to make reasonable adjustments to the recruitment process for candidates with a disability. This processing is necessary for the purposes of carrying out our obligations under employment law.

The company processes special category data (your equal opportunities monitoring information) as part of its equal opportunities monitoring and relies on the condition of the substantial public interest to provide equality of opportunity and treatment. Provision of this information is entirely voluntary.

Legitimate Interests

The Company processes personal data during the recruitment process and keeps records of that process. Processing such data from job applicants enables the Company to fulfil its legitimate interests of managing the recruitment process, assessing the suitability of candidates and making informed decisions as to whom we wish to recruit. The Company may also have to process data from job applicants in order to fulfil its legitimate interest in defending legal claims.

For more information on specific legitimate interest assessments for any relevant processing activities in this section, please contact the relevant HR Manager or the Data Protection Officer via the contact details above.

6. If you fail to provide personal information

You are under no obligation to provide the Company with personal data during the recruitment process. However, if you do not provide certain personal information when requested, the Company may not be able to process your application for employment properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for you if this information is not provided.

7. Change of purpose

The Company will only use your personal information for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

You should be aware that we may process your personal information without your knowledge or consent where this is required or permitted by law.

8. Automated decision-making

Our employment decisions are not based solely on automated decision-making.

9. For how long do we keep your personal data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes we collected it for, including any legal, accounting or reporting requirements. If your application for employment is unsuccessful, the company will destroy your data unless you specifically consent for your data to be kept for a longer specified period in order to be considered for any other suitable position within a twelve (12) month period.

If your application for employment is successful, personal data gathered during the new recruitment process will be transferred to your personnel file and we shall inform you through a new privacy notice which sets down the details of how we process your data in an employment relationship including the periods for which your data shall be held.

10. Who has access to data?

Your information will be shared internally for the purposes of the recruitment process, including with members of the HR team and interviewers.

The Company will not share your data with third parties unless you accept an offer of employment, or if you have otherwise requested us to do so.] In those circumstances, the Company shall share your data with third parties where required by law and where it is necessary to administer the employment relationship with you or where we have another legal basis in doing so. If this the case we will inform you through a new privacy notice which sets out the details of how we process your data in an employment relationship including the recipients of your personal data and any data transfers to countries outside the UK.

11. Where is your data accessed from/transferred to?

During the recruitment process your personal data may be shared internally with other companies in our group who are based outside the UK, e.g. in Switzerland. For Swiss transfers, we rely on the UK government's adequacy regulation in respect of Switzerland.

To the extent personal data is shared with third parties located in non-adequate jurisdictions outside the UK during the recruitment process, we rely on the UK's international data transfer agreement (or addendum) in order to make such transfers.

Further information on any relevant transfer mechanisms and adequacy regulations can be requested from the relevant HR Manager or the Data Protection Officer via the contact details above.

12. How does the Company protect personal data?

The Company takes the security of our data seriously. The Company has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties.

When the Company engages third parties to process personal data on its behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of data.

13. Your rights

As a data subject, in certain circumstances you may have the following rights. You can request the Company to:

1. access and obtain a copy of your data on request (known as a "data subject access request" and the "right of access");
2. require the Company to change incorrect or incomplete data (known as "right of rectification");
3. request erasure of your personal information. This enables you to ask the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing (known as "right of erasure");
4. object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing (known as "right of objection");
5. ask the Company to suspend the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it (known as "right to restriction of processing");
6. receive your provided personal data from the Company in a structured, commonly used and machine-readable format (known as "Right to data portability") if the personal data is processed based on your consent or in performance of a contract; and
7. withdraw your consent at any time. Consequently, we are no longer allowed to continue the data processing based on this consent for the future, but this will not affect the legal basis for processing based on consent prior to the withdrawal of consent.

If you believe that the Company has not complied with your data protection rights, you have the right to lodge a complaint with a supervisory authority to:

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow, Cheshire
SK9 5AF
Helpline: 0303 123 1113

If you would like to exercise any of these rights, or you have any questions about the privacy notice, please contact the HR Manager or the relevant Data Protection Officer via the contact details above

14. Updating our Privacy Notice

Constant technological development makes it necessary to adapt our Privacy Notice from time to time. We reserve the right to change this Privacy Notice at any time with effect for the future. A current version is available on our intranet for your convenience and access at any time. If we change our Privacy Notice we will inform of this by appropriate means.

Annex: What information for what purpose and on what legal basis does the Company collect and process personal data?

Data Categories
1. Personal Information: your name, title, gender, date of birth; 2. Contact Information: address and contact details, including email address and telephone number; 3. Application documents and data: CV, references, certificates 4. Professional Data: qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the Company; 5. Lawful selection testing data where requested; which results shall only be interpreted by those qualified to do so; 6. Nationality ID Information: information about your nationality and entitlement to work in the country; 7. Compensation & Benefits: information about your remuneration, including entitlement to benefits such as pensions;
We may also collect the following special categories of more sensitive personal information: a) information about medical or health conditions, including whether or not you have a disability for which the Company needs to make reasonable adjustments, in accordance with local labor law b) information about your criminal record in accordance with UK applicable regulations; and c) equal opportunities monitoring information, including information about your health and religion or belief in accordance with UK applicable regulations.

Purpose for processing personal data	Data Categories	Legal Basis for processing
Prior to entering a contract with you and when entering into an **employment contract** with you and to meet its **obligations** under your employment contract.	Personal Information; Contact Information; Nationality ID Information; Application documents and data; Selection Testing Data; Professional Data; Compensation & Benefits	**Performance of a contract** (Art. 6 sec. 1 lit. b GDPR)
Check an applicant's entitlement to work in the country	Nationality ID Information	**Compliance with a Legal Obligation** (Art. 6 sec. 1 lit. c GDPR)
Process personal data during the recruitment process and keep records of that process	Personal Information; Contact Information; Nationality ID Information; Professional Data; Selection Testing Data (where required)	**Legitimate Interests** (Art. 6 sec. 1 lit. f GDPR) (We have a legitimate interest in managing the recruitment process, assessing the suitability of candidates and making informed decisions as to whom we wish to recruit. We also have a legitimate interest in defending legal claims)
Carry out criminal record checks	Criminal Record Information	**Compliance with a Legal Obligation** (Art. 6 sec. 1 lit. c GDPR) Where checks are mandatory under UK law **Legitimate Interests** (Art. 6 sec. 1 lit. f GDPR) Where UK law does not specify mandatory checks (We have a legitimate interest in ensuring the suitability and safety of our workforce)

Make reasonable adjustments to the recruitment process for candidates with a disability	Medical & Health Condition Information	**Compliance with a Legal Obligation** (Art. 6 sec. 1 lit. c GDPR)
Conduct equal opportunities monitoring	Equal Opportunities Monitoring Information	**Compliance with a Legal Obligation** (Art. 6 sec. 1 lit. c GDPR) Where processing is mandatory under UK law **Legitimate Interests** (Art. 6 sec. 1 lit. f GDPR) Where UK law does not specify mandatory checks (We have a legitimate interest in analyzing and monitoring the diversity of our workforce)