



# Job Applicant Privacy Notice

Document Type:	Job Applicant Privacy Notice	Approved by:	Hsin Loke
Version No.:	1.1	Approval date:	08/06/2021
Author:	Kathryn North	Review date:	As required
Creation date:	08/06/2021	Circulation:	OMass website

## 1. PURPOSE AND INTRODUCTION

The purpose of this notice is to explain what personal data (information) OMass Therapeutics Limited (“OMass”, the “Company”, “we”, “us” or “our”) will hold about you, how we collect it, how we will use and may share information about you during the application and recruitment process. We are required to notify you of this information under data protection legislation.

## 2. DATA CONTROLLER DETAILS

OMass is a data controller, meaning that we are responsible for deciding how we hold and use personal information about you. Our contact details are as follows:

OMass Therapeutics, The Schrödinger Building, Heatley Road, The Oxford Science Park, Oxford OX4 4GE, UK. Tel: +44 (0)1865 548356.

## 3. DATA PROTECTION PRINCIPLES

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for valid purposes that have been explained to you and not used in a way that is incompatible with those purposes
- ensure it is accurate and kept up to date
- keep your data for only as long as we necessary for the purposes we have told you about
- keep you data securely.

## 4. TYPES OF DATA WE PROCESS

The types of data we hold about you are:

- information you have provided to us in your CV and covering letter or email, including references, qualifications, education history and employment history. We may also seek to verify such information by way of references.
- your personal details including your name, title, address, date of birth, email address, phone numbers, gender, marital status.
- whether or not you have a disability.
- Further information may be collected directly from you or third parties after shortlisting and is required to enable us to verify your right to work and suitability for the position, such as:

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- Information regarding your academic and professional qualifications and employment history from references from previous employers and/or education providers;
- documentation relating to your right to work in the UK;
- information relating to your health;

## 5. HOW WE COLLECT YOUR DATA

We collect data about you from a variety of sources: - your referees (details of whom you will have provided), your education provider(s), any relevant professional body, and the Home Office.

## 6. WHY WE PROCESS YOUR DATA AND HOW WE USE IT

We will typically collect and use this information for the following purposes:

- to take steps to enter into a contract
- in order to comply with a legal obligation
- in order for us to carry out our legitimate interests or those of a third party (e.g. benefits provider)
- carrying out of obligations or exercising rights in employment law
- where something is done in the public interest
- to establish, exercise and/or defend any legal claims that may be brought by or against the Company in connection with your recruitment.

All of the processing carried out by us falls into one of the permitted reasons.

Having received your CV and covering letter or email, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and/or carry out any other background check or verification of your data in respect of employment history and/or education and qualifications before confirming your appointment.

If you are unsuccessful in obtaining employment, we may seek your consent to retain your data in case other suitable job vacancies arise in the Company for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

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## 7. SPECIAL CATEGORIES OF DATA

We will only use your special category data (i.e. particularly sensitive personal information in the following ways:

- Information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process;

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

## 8. IF YOU DO NOT PROVIDE YOUR DATA TO US

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with your application.

## 9. SHARING YOUR DATA

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers and third-party service providers that perform services and functions at our direction and on our behalf, namely our IT service providers and recruitment service providers, in order to effectively operate our business. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with third parties as required to comply with law. For the most part, such information will be shared for the purpose of processing your application and conducting such verification checks applicable to your role in the event you are selected.

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We may share your data with bodies outside of the European Economic Area, for operational purposes where our third-party providers are located outside of the EEA. In these cases, we will require such providers to respect the security of your data and to treat it in accordance with the law.

## 10. PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Details of these measures are available on request from the Data Protection Officer and are contained within our IT Security, Data Protection, Data Transfer and Personal Data Breach Policies, as well as our Employee Privacy Notice.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Where we share your data with third parties, they will only process your personal information on our written instructions and where they have agreed to treat the information confidentially and to keep it secure. All Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## 11. HOW LONG WE KEEP YOUR DATA FOR

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), and/or in line with our sponsor licence obligations; after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment, in which case your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

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## 12. AUTOMATED DECISION MAKING

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

## 13. YOUR RIGHTS IN RELATION TO YOUR DATA

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the **right to be informed**. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the **right of access**. You have the right to access the data that we hold on you. To do so, you should make a subject access request
- the right to **request correction**. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have **request erasure**. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to **request the restriction of processing** of your personal data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to **request the transfer of your personal data** to another party.
- the right to object to **processing**. You have the right to object to the way we use your data where we are relying on a legitimate interest (or those of a third party) where there is something about your particular situation which makes you want to object to processing on this ground.
- the right to **regulate any automated decision-making** and profiling of personal data. You have a right not to be subject to automated decision making in ways that adversely affect your legal rights.

Where you have provided consent to our use of your data for the purposes of the recruitment exercise, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use.

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If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

If you wish to exercise any of the rights explained above, please contact our Data Protection Officer (contact details set out below).

#### 14. FEES

You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### 15. MAKING A COMPLAINT

We hope that our Data Protection Officer can resolve any query or concern you raise about the use of your information. If not, contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

#### 16. DATA PROTECTION OFFICER

The Company's Data Protection Officer is currently Dr Hsin Loke who can be contacted on Tel: +44 (0)1865 548350 or at [hsin.loke@omass.com](mailto:hsin.loke@omass.com).

#### 17. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to change this Privacy Notice at any time so please check back regularly to obtain the latest copy of this Privacy Notice.

This Privacy Notice does not override any applicable national data privacy laws and regulations in countries where OMass operates.

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