



Job Applicant Data Privacy Notice

Document Details

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Document Purpose

This notice explains what personal data OMass Therapeutics Limited ("OMass") will hold about you, how we collect, use, and share it during the application and recruitment process, as required by data protection legislation.

Document Intended Audience

Job Applicants

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Data Controller Details

OMass is a data controller, meaning we are responsible for deciding how we hold and use your personal information. Our contact details are as follows: Info@Omass.com OMass Therapeutics, Building 4000, Chancellor Court, John Smith Drive, ARC Oxford, OX4 2GX, UK.

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 necessary for the purposes we have told you about
- Hold your data securely.

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 through references.
- Your personal details, including your name, title, address, date of birth, email address, phone numbers, gender, and 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:
 - 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;

How We Collect Your Data

We collect your data through:

- Direct submissions (e.g. job applications, emails)
- Recruitment platforms and job boards
- Interviews and assessments

- Third parties (e.g. referees, background check providers)

Why We Process Your Data and How We Use It

We collect and use your personal data for the following lawful reasons:

- To take steps towards entering into a contract with you
- To comply with legal obligations
- To pursue our legitimate interests or those of a third party (e.g. benefits providers)
- To meet employment law requirements
- Where processing is in the public interest
- To establish, exercise or defend legal claims related to your recruitment

All processing we carry out falls under one of the permitted reasons.

When you apply, we use your CV and cover letter/email to assess whether you meet the role's basic criteria. If shortlisted, we evaluate your application to decide whether to invite you for an interview. If interviewed, we use the information you provide to determine whether to offer you the role.

If offered, we will verify references, employment history, education and qualifications before confirming your appointment.

If unsuccessful, we may ask for your consent to retain your data for future job opportunities. You are free to decline, and doing so will not affect your application.

Special Categories of Data

We will only use your special category data (i.e. particularly sensitive personal information, which we may process 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 to use special categories of personal data to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent 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.

If You Do Not Provide Your Data to Us

One of the reasons we process your data is to enable 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 if the requested data is not provided.

Data Sharing and Protection

We take data security seriously and apply robust technical and organisational measures to prevent accidental loss, unauthorised access, misuse, or disclosure. Personal data may be shared with HR consultants, professional advisers, service providers (e.g. IT and recruitment), and legal or regulatory bodies where required.

All recipients are bound by confidentiality and data protection obligations and act only on our written instructions. Where data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards are in place.

Access to your data is restricted to those with a business need, and our procedures for managing suspected breaches include notifying you and any applicable regulator where legally required. Where possible, data will be anonymised.

We take data security seriously and have measures in place to prevent accidental loss, unauthorised access, misuse, or disclosure. These include technical and organisational safeguards, and access is restricted to those without a business need.

Details of our security practices are available on request. We have put in place procedures to address any suspected data security breach and will notify you and any applicable regulator where we are legally required to do so.

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. Where there is a clear business need to retain data longer, we will assess whether it can be anonymised and explain the retention period.

If your application is successful, relevant recruitment data will be transferred to our employee systems and managed in accordance with our data management processes and policies.

Automated Decision Making

We do not make decisions about you solely through automated processing that would significantly affect you (e.g. hiring decisions). While our Applicant Tracking System (ATS) may assist with screening, all decisions are made through human review and discretion.

If this changes, we will notify you in writing and explain your rights under UK GDPR.

Your Rights in Relation to Your Data

Under data protection law, you have the following rights:

- **To be informed** about how we use your data (as set out in this notice)
- **To access** your data via a subject access request
- **To correct** inaccurate or incomplete data
- **To request erasure** of your data where there's no valid reason for continued processing
- **To restrict processing** while accuracy or legality is being verified
- **To request data portability** to another party
- **To object** to processing based on legitimate interests
- **To not be subject to solely automated decisions** that significantly affect you

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 we will stop processing the data you previously gave us permission to use.

If you object to us using your data where we rely on "legitimate interests," we must stop unless we can show that either (1) our need to process it is more compelling and outweighs your rights, or (2) we need the data for legal claims.

To exercise any of these rights, please contact our Data Protection Officer.

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.

Making A Complaint

We hope our Data Protection Officer can resolve any questions or concerns you raise about how your information is used. 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.

Data Protection Officer

The Company's Data Protection Officer is currently Hanna Machray, who can be contacted on hanna.machray@omass.com

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.