



## **EEA, Switzerland and UK Data Protection Notice for Job Applicants**

ComPsych Corporation is committed to protecting the Personal Information it receives from job applicants as part of the recruitment process and complying with General Data Protection Regulation ("GDPR"), the Data Protection Act of 2018 of the United Kingdom ("UK") and the Swiss Federal Act on Data Protection ("FADP"), as applicable (collectively referred to as the "Data Protection Regulations" for purposes of this Notice).

This Data Protection Notice ("Notice") applies to all candidates for positions with ComPsych in a member state of the European Union or the European Economic Area, the United Kingdom or Switzerland. The purpose of this Notice is to make job applicants aware of how and why we collect and use your Personal Information during the recruitment process. ComPsych is required to notify you of the information contained in the Notice under the GDPR.

ComPsych has appointed a Data Protection Officer to oversee compliance with this Notice. If you have any questions about the Notice or about how ComPsych handles your Personal Information, or for requests to exercise your rights, please contact our Privacy Official at [privacyofficial@compsych.com](mailto:privacyofficial@compsych.com).

### **Data Protection Principles**

ComPsych complies with the data protection principles set forth in the Data Protection Regulations. Specifically, ComPsych ensures that the Personal Information we collect about you is:

1. Processed lawfully, fairly and in a transparent manner;
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary in relation to those purposes;
4. Accurate and, where necessary, kept up to date;
5. Kept in a form which permits your identification for no longer than is necessary for those Purposes;
6. Processed in a way that ensures appropriate security of the data.

## **Personal Information Collected**

Personal Information is any information about an individual from which that person can be directly or indirectly identified ("Personal Information"). Personal Information does not include anonymized data, i.e., data that has had personally identifiable information removed or modified so that it cannot be linked to a specific person. ComPsych may also collect "special categories" of personal information, such as information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature ("Special Categories"). Special Categories of Personal Information include information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, and genetic and biometric data.

ComPsych may collect, use and process the following Personal Information about you during the recruitment process:

- your contact details, including your name, address, telephone number and personal e-mail address;
- Personal Information included in a CV, any application form, cover letter or interview notes;
- references;
- information about your right to work in the EEA, UK and/or Switzerland and copies of proof of right to work documentation;
- copies of qualification certificates;
- copy of driving licence;
- other background check documentation;
- details of your skills, qualifications, experience and work history with previous employer
- information about your current remuneration package;
- Your professional memberships;

ComPsych may also collect, use and process the following Special Categories of your Personal Information during the recruitment process:

- whether or not you have a disability for which ComPsych needs to make reasonable adjustments during the recruitment process.

Apart from complying with the duty to make reasonable adjustments for disabled job applicants, ComPsych will not ask questions relating to Sensitive Personal Information until an offer of employment has been made.

### **Collection of Your Personal Information**

ComPsych collects Personal Information about you during the recruitment process directly from you or third parties once an offer of employment or engagement has been made to you. ComPsych will inform you that we are collecting such information. You are under no statutory or contractual obligation to provide Personal Information to ComPsych during the recruitment process. Your Personal Information may be stored in different places, including on your application record, in the Company's HR management system and in other IT systems, such as the e-mail system.

### **Use of Your Personal Information**

ComPsych will only use your Personal Information when the law allows us to. These are known as the legal bases for processing. ComPsych will use your Personal Information in one or more of the following circumstances:

- where we need to do so to take steps at your request prior to entering into a contract with you, or to enter into a contract with you (1);
- where we need to comply with a legal obligation (2);
- where it is necessary for our legitimate interests (or those of a third party), and your interests, or your fundamental rights and freedoms do not override our interests (3).

ComPsych needs the Personal Information it collects about you primarily to enable us to take steps at your request to enter into a contract with you (1), and to enable us to comply with our legal obligations (2). In some cases, we may also use your Personal Information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests (3).

ComPsych's legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective employees and performing effective internal administration.

The purposes for which we are processing, or will process, your Personal Information are to:

- manage the recruitment process and assess your suitability for employment or engagement;
- decide to whom to offer a job;
- comply with statutory and/or regulatory requirements and obligations;
- comply with the duty to make reasonable adjustments for disabled job applicants;
- ensure compliance with your statutory rights;
- ensure effective HR management and business administration; and

- enable us to establish, exercise or defend possible legal claims.

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Failure to Provide Personal Information: If you fail to provide certain Personal Information when requested, ComPsych may not be able to process your job application properly or at all, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

Change of Purpose: ComPsych will only use your Personal Information for the purposes for which we collected it, i.e. for the recruitment exercise for which you have applied

### **Access to Your Personal Information**

Your Personal Information may be shared internally within ComPsych for the purposes of the recruitment process, including with members of the HR department, members of the recruitment team, managers in the department which has the vacancy, and IT staff where access to your Personal Information is necessary for the performance of their roles.

ComPsych will not share your Personal Information with third parties during the recruitment process unless your job application is successful and we make you an offer of employment or engagement. At that stage, we may also share your Personal Information with third parties (and their designated agents), including:

- external organizations for the purposes of conducting pre-employment reference and employment background checks;
- external organizations to obtain a criminal record check;
- former employers, to obtain references;
- professional advisors, such as lawyers.

ComPsych may also need to share your personal information with regulators or to otherwise comply with the law.

### **Retention of Your Personal Information**

ComPsych will only retain your Personal Information for as long as is necessary to fulfil the purposes for which it was collected and processed. If your application for employment or engagement is unsuccessful, ComPsych will generally hold your Personal Information for one year after the end of the relevant recruitment processes, unless there is a statutory reason to keep your information or you have asked us to keep your information on file for future recruitment opportunities. If your application for employment or engagement is successful, Personal Information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors. Personal Information which is no longer to be retained will be securely and effectively destroyed.

## Your Rights Related to Your Personal Information

Subject to certain conditions, and in certain circumstances, you have the right to:

- request **access** to your Personal Information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- request **rectification** of your Personal Information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected;
- request the **erasure** of your Personal Information - this enables you to ask us to delete or remove your personal information where there is no compelling reason for its continued processing, e.g. it is no longer necessary in relation to the purpose for which it was originally collected;
- **restrict** the processing of your Personal Information - this enables you to ask us to suspend the processing of your Personal Information;
- **object** to the processing of your Personal Information - this enables you to ask us to stop processing your Personal Information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground;
- **data portability** - this gives you the right to request the transfer of your Personal Information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact our Data Protection Officer at [privacyofficial@compsych.com](mailto:privacyofficial@compsych.com). We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your Personal Information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our Data Protection Officer at [privacyofficial@compsych.com](mailto:privacyofficial@compsych.com). Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that ComPsych has not complied with your data protection rights, you have the right to make a complaint to supervisory authority for data protection issues at any time. ***We would, however, appreciate the chance to address your concerns before you approach the data protection authority, so please contact us in the first instance.***

**If you are applying for a role in the United Kingdom:**

The Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk))

**If you are applying for a role in Luxembourg:**

The National Commission for Data Protection (Commission Nationale Pour La Protection Des Données (CNPD)) is the supervisory authority for data protection issues in the Grand- Duchy of Luxembourg (<https://cnpd.public.lu>).

**If you are applying for a role in Spain:**

The Spanish Data Protection Agency (Agencia Española de Protección de Datos (AEPD)) is the Spanish supervisory authority for data protection issues (<http://www.agpd.es>).

**If you are applying for a role in France:**

The Commission Nationale de l'Informatique et des Libertés (CNIL) is the French supervisory authority for data protection issues (<https://www.cnil.fr>).

**If you are applying for a role in Germany:**

The Der Hassische Beauftragte für Datenschutz und Informationsfreiheit (HBDI) is the supervisory authority for data protection issues in Hessen (<https://www.datenschutz.hessen.de>).

**If you are applying for a role in Sweden:**

The Swedish Data Protection Authority (Integritetsskyddsmyndigheten (IMY)) is the Swedish supervisory authority for data protection issues (<https://www.datainspektionen.se/>).

**If you are applying for a role in Switzerland:**

The Federal Data Protection and Information Commissioner (FDPIC) is the Swiss authority for data protection issues (<https://www.edoeb.admin.ch>).

**Transferring Personal Information Outside of the EEA, UK and Switzerland**

ComPsych and its third parties (as defined herein) are located in the United States. Therefore, your Personal Information will be transferred outside of the United Kingdom (UK), Switzerland or the European Union (EU)/European Economic Area (EEA).

Such transfer is carried out in compliance with applicable laws and regulations and under the EU-US Data Privacy Framework (which is subject to an adequacy decision by the European Commission), as well as under any applicable UK or Swiss extension to that Framework.

Please contact the Data Privacy Officer if you would like further information on the specific mechanisms used by us when transferring your personal information outside of Switzerland, the EU/EEA or the UK.

### **Automated Decision-making**

Automated decision-making occurs when an electronic system uses your Personal Information to make a decision without human intervention. ComPsych does not envisage that any recruitment decisions will be taken about you based solely on automated decision-making, including profiling.

### **Changes to this Notice**

ComPsych reserves the right to update or amend this Notice at any time. We will post a new Notice on our website when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

### **Contact**

If you have any questions about this Notice or how we handle your Personal Information, please contact our Data Protection Officer at [privacyofficial@compsych.com](mailto:privacyofficial@compsych.com).