

Privacy Policy for Job Applicants (effective 25th May 2018)

In accordance with the General Data Protection Regulation (GDPR), introduced on 25th May 2018, Metrion Biosciences (hereinafter "Metrion") has implemented this privacy notice to inform you, as a prospective employee of Metrion, of the types of data Metrion may process about you. Metrion also includes within this notice the reasons for processing your data, the lawful basis that permits Metrion to process it, how long Metrion keeps your data for and your rights regarding your data.

I. THE PRINCIPLES OF DATA PROTECTION

Under GDPR, all personal data obtained and held by Metrion must be processed according to a set of core principles. In accordance with these principles, Metrion will ensure that:

- a) processing of personal data is fair, lawful and transparent;
- b) collection of data is for specific and legitimate business purposes;
- c) the data collected is sufficient, relevant and limited to that necessary for the purposes of processing;
- d) we keep accurate and up to date copies of your data. Data subsequently found to be inaccurate will be rectified or erased without undue delay;
- e) we retain data for no longer than is necessary for its given purpose;
- f) we process data in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures; and
- g) Metrion complies with the relevant GDPR procedures for international transferring of personal data.

II. DATA METRION MAY HOLD

Metrion keeps several categories of personal data on prospective employees in order to carry out effective and efficient processes. Metrion may keep this data as hard copy recruitment files relating to each vacancy and/or as data stored within a limited access, secure area our computer systems.

Specifically, Metrion holds the following types of data:

- a) personal details such as name, address, phone numbers;
- b) name and contact details of your next of kin;
- c) your photograph;
- d) your gender, marital status, information of any disability you have or other medical information;
- e) right to work documentation;
- f) information on your race and religion for equality monitoring purposes;
- g) information gathered via the recruitment process such as that entered into a curriculum vitae or included in a curriculum vitae cover letter;
- h) references from former employers;
- i) details on your education and employment history etc;
- j) your passport and/or driving licence; and
- k) criminal convictions.

III. DATA COLLECTION

You may elect to provide several pieces of data to Metrion directly during the recruitment exercise. Metrion may also collect data about you from third parties, such as employment agencies and former employers when gathering references associated with the recruitment process.

If you are successful in your job application and, after acceptance of our offer of employment, Metrion will gather further information from you, for example, your bank details and next of kin details.

IV. DATA PROCESSING: LAWFUL BASIS

The law on data protection allows Metrion to process your data for certain reasons only.

The information below categorises the types of data processing Metrion undertakes and the lawful basis Metrion relies on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Legitimate interests of the company
Making decisions about salary and other benefits	Legitimate interests of the company
Making decisions about contractual benefits to provide to you	Legitimate interests of the company
Assessing training needs	Legitimate interests of the company
Dealing with legal claims made against Metrion	Legitimate interests of the company
Preventing fraud	Legitimate interests of the company

V. PROCESSING DATA DEFINED WITHIN SPECIAL CATEGORIES

Special categories of data are data relating to your:

- a) race;
- b) ethnic origin;
- c) politics;
- d) religion;
- e) trade union membership;
- f) genetics;
- g) biometrics;
- h) health;
- i) sex life; or
- j) sexual orientation;

Metrion carries out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring; and
- b) to determine reasonable adjustments

Most commonly, Metrion will process special categories of data when the following applies:

- a) you have given explicit consent to the processing;
- b) Metrion must process the data in order to carry out our legal obligations;
- c) Metrion must process data for reasons of substantial public interest; and
- d) you have already made the data public.

VI. FAILURE TO PROVIDE DATA

Your failure to provide Metrion with data may mean that Metrion is unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

VII. DATA RELATING TO CRIMINAL CONVICTION

Metrion will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits Metrion to collect the data. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. Metrion uses criminal conviction data to determine your suitability, or your continued suitability for the role. Metrion relies upon EU and UK laws on data protection to process this data.

VIII. SHARING YOUR DATA

Employees within Metrion who are authorised to be involved in recruitment will have access to your data relevant to their function. All Metrion employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data may be shared with third parties for the following reasons: confirmation of identity and confirmation of qualifications listed in your curriculum vitae.

Metrion may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon Metrion. Metrion has a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

Metrion does not share your data with bodies outside of the European Economic Area.

IX. PROTECTING YOUR DATA

Metrion are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. Metrion has implemented processes to guard against such.

X. DATA RETENTION PROCEDURE

Metrion will only retain your data for as long as the company requires it, which, in relation to unsuccessful candidates, is six months to one year.

If your application is not successful and Metrion have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, Metrion will keep your data for six months once the recruitment exercise ends.

If Metrion has sought your consent to keep your data on file for future job vacancies, and you have provided consent, Metrion will keep your data for nine months once the recruitment exercise ends. At the end of this period, Metrion will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that Metrion will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems Metrion administers for employees. Metrion have a separate privacy notice for employees, which will be provided to you.

XI. AUTOMATED DECISION MAKING

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. Metrion does not use automated decision-making during recruitment.

XII. YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

You have the following rights in relation to the personal data Metrion holds on you:

- a) the right to be informed about the data Metrion holds on you and what Metrion do with it;

- b) the right of access to the data Metrion holds on you. Metrion operates a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data Metrion holds on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data Metrion holds on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information; and
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that Metrion will stop processing the data that you had previously given Metrion consent to use. There will be no consequences for withdrawing your consent. However, in some cases, Metrion may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any rights relating to your personal data, please contact:

The Data Compliance Officer, Metrion Biosciences Limited. Telephone: 01223 919100.

XIII. COMPLAINTS PROCEDURE

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.