

## Privacy Policy for Recruitment

### 1. General

Boehringer Ingelheim Limited, Boehringer Ingelheim Animal Health UK Limited ("We" or "us") are committed to protecting and respecting your privacy.

This Privacy Policy applies to all personal data (including special categories of personal data) regarding you that we hold. This privacy policy should be read together with our general Privacy Policy (<https://www.boehringer-ingelheim.co.uk/privacy-policy>).

In this Privacy Policy, the terms "*personal data*", "*special categories of personal data*", "*processing*", "*data controller*" and "*data processor*" shall have the meaning ascribed to them in the General Data Protection Regulation (EU) 2016/679 the (**GDPR**).

This Privacy Policy sets out the basis on which we will process any personal data We collect from you, or that you provide to us.

Please read the following carefully to understand our views and practices regarding personal data and how We will treat it.

The data controller is Boehringer Ingelheim Limited or Boehringer Ingelheim Animal Health UK Limited, of Ellesfield Avenue, Bracknell, Berkshire RG12 8YS.

### 2. Personal data we may collect

We may collect and process the following personal data about you:

**Personal data you give us.** Applicants give us a great deal of personal data, including address, contact details, date of birth, marital status, visa status, health information, educational and professional background.

**Personal data we collect about you.** We also hold information regarding your CV, your ID, and information you provide to us during an interview.

**Personal data we receive from other sources.** We may receive information about you in the course of conducting reference checks. We may combine information we obtain from other sources with information you give to us. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### 3. Uses made of the personal data

We may process personal data regarding you for a number of purposes (including but not limited to):

- Assessing your skills, qualifications, and suitability for the role.
- Our statutory responsibilities such as our obligations related to tax, leave, work permits, anti-bribery and corruption and equal opportunities monitoring

- Keep company records related to our hiring processes and to comply with our legal obligations.
- Checking you have the right to work in the country.
- Checking you have the requirements.
- Checking you against global sanction lists.

#### 4. **Disclosure of personal data**

In order to perform our contractual, statutory and management obligations, We will be obliged to disclose personal data regarding you to third parties in certain circumstances including (but not limited to) the following:

- i. to our professional advisers, including lawyers, accountants, tax advisors and auditors;
- ii. to regulatory or government bodies;
- iii. if We sell or buy any business or assets, in which case We will disclose personal data regarding you to the prospective seller or buyer of such business or assets;
- iv. if We are under a duty to disclose or share personal data regarding you in order to comply with any legal or regulatory obligation or request, or in order to enforce or apply our terms of use or to protect the rights, property, or safety of Boehringer Ingelheim Limited and Boehringer Ingelheim Animal Health UK Limited, our customers, or others;
- v. third parties to whom We outsource services such as data hosting, analytics, recruitment services;
- vi. to business partners, suppliers and sub-contractors for the performance of any services for us;
- vii. to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006; and/or
- viii. for any other purposes that you would reasonably expect.

Before We disclose any personal data to a third party, We take steps to ensure that the third party will protect personal data regarding you in accordance with applicable privacy laws and in a manner consistent with this Privacy Policy. Third parties are required to restrict their use of this information to the purpose for which the information was provided.

We may transfer personal data regarding you to overseas recipients for business purposes and operational, support and continuity purposes, for example, when We use IT service providers or data storage services which are located overseas. Countries where these recipients are located may have data protection laws which differ to the data protection laws in your country of residence.

We will disclose personal data regarding you to third parties in order to protect the rights, property or safety of Boehringer Ingelheim Limited, Boehringer Ingelheim Animal Health UK Limited our customers, or others.

## 5. **Where We store personal data**

All information you provide to us is stored on our secure servers, or those secure servers of our third-party service providers. The safety and security of personal data regarding you also depends on you. Where We have given you (or where you have chosen) a password that enables you to access certain parts of a website that we operate, you are responsible for keeping this password confidential. We ask that you do not share a password with anyone.

The security of personal data regarding you is a high priority. We take such steps as are reasonable to securely store personal data regarding you so that it is protected from unauthorised use or access, misuse, loss, modification or unauthorised disclosure. This includes both physical and electronic security measures. Examples include the use of passwords, locked storage cabinets and secured storage rooms. Other features include:

- storing information on secured networks consistent with industry standards, which are only accessible by those employees who have special access rights to such systems;
- using industry-standard encryption technologies when transferring or receiving personal data, such as SSL technology;
- restrictions are placed on the electronic transfer of files; and
- our IT networks undergo necessary vulnerability testing to continually identify and remediate potential opportunities for unauthorised data access.

We takes steps to destroy or de-identify personal data when the information is no longer required for any purpose for which it may be used or disclosed by us and We are no longer required by law to retain the information. We continue to hold such anonymised information indefinitely.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services or for sending you information you have consented to. By submitting personal data regarding you, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that personal data regarding you is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect personal data regarding you, or procure that personal data regarding you is secured, We cannot guarantee the security of such data transmitted to us; any transmission is at your own risk. Once We have received personal

data regarding you, We use strict procedures and security features to try to prevent unauthorised access.

#### **6. Access to information**

You have the right to access information held about you. Your right of access can be exercised in accordance with applicable law, including the GDPR. To protect your privacy, We may take steps to verify your identity before taking any action in response to any request. We do not normally charge for the time spent responding to such requests, but reserve the right to do so, subject to the requirements of applicable law.

To request access to personal data We hold regarding you, please send correspondence to Data Protection Officer, Legal & Compliance Department, Boehringer Ingelheim Limited, Ellesfield Avenue, Bracknell, Berkshire RG12 8YS.

#### **7. Changes to our Privacy Policy**

We review and amend this Privacy Policy from time to time. Please check back frequently to see any updates or changes to our Privacy Policy on <https://www.boehringer-ingelheim.co.uk/privacy-policy>.

Last Reviewed: October 2018