

# **Biomedica Privacy Policy – Job Applicants**

Effective: 09/02/2024

This Privacy Policy (together with any other documents referred to herein) sets out the basis on which Biomedica collects and processes your personal data in connection with our recruitment processes. When we refer to ourselves as “we” or “Biomedica,” we mean Biomedica GMBH and all its subsidiary companies. Our sites may contain links to third party websites/content/services that are not owned or controlled by Biomedica.

Biomedica is not responsible for how these properties operate or treat your personal data, so we recommend that you read the privacy policies and terms associated with these third parties’ properties carefully.

The aim of this Privacy Policy is to inform job applicants (hereinafter “you” or “your”) on how your data is processed under data protection laws and regulations applicable at the regional or country level, in the jurisdictions in which Biomedica is either physically established or carries out its business operations.

Where you apply for a job opening posted by Biomedica, these Privacy Notice provisions will apply to our processing of your personal information in addition to our other Privacy Policy which has been provided to you separately or is available on our website. See: [Privacy Policy | Biomedica](#)

Where you apply for a job opening via the application function on a job site or similar online service provider, you should note that the relevant provider may retain your personal data and may also collect data from Biomedica in respect of the progress of your application. Any use by the service provider of your data will be in accordance with the service provider’s Privacy Notice.

## **INFORMATION THAT WE COLLECT FROM YOU**

### **Information You Provide**

We collect personal information from you in connection with your job application, communication, and future career opportunities at Biomedica.

Information we collect includes:

- Information for contact - name, address, telephone number/s, e-mail address/ess, and other contact information.
- Application Documents - CV, résumé, and cover letter.
- Previous Experience - previous work, on the job and other relevant experience.
- Educational background - education, including level, type, subject-matter, degrees, diplomas, certificates, and issuing institutions/bodies.
- Position of Interest - positions, roles, and prospects of interest, and if applicable, position suggested.
- Skills and competencies - knowledge, skills, languages, and other related competencies.
- Certifications held - professional and other work-related certificates, authorizations and endorsements held.
- Reference Details - information you provide related to work/professional references and references information.
- Online Information - application identifiers, internet protocol (IP) address and device identifiers that may be automatically collected.
- Communication Preferences - preferred communication method and language in case relevant.
- Recruitment/interview meeting/event Information - dietary restrictions, travel and accommodation details, government-issued identification to access one of our physical premises, and other details specific to a particular recruiting interview, meeting, or other event.
- Work Authorization - work authorization status and relevant visa or other immigration information.
- Conflict of Interests Information - Information on personal relationships and external board memberships to non-Biomedica companies, close personal relationships which may present potential conflict of interests such as close personal relationships with healthcare professionals, government officials, third party intermediaries, competitors, suppliers, etc; appointments, roles, and other information that may present potential conflict of interest with Biomedica, only when requested in relation to shortlisted candidates.
- Other Information - any other information you otherwise elect to provide to us (e.g., employment preferences, willingness to relocate, current salary and benefits packages, desired salary and desired benefits packages, awards, or professional memberships).

We may also inquire about criminal records certificates following a conditional offer of employment, where permitted by applicable law.

Except as specifically requested or legally required, we ask that you avoid submitting information in your application which may be deemed as sensitive information. Sensitive information includes data about your race, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, political or philosophical beliefs, political party or trade union membership, veteran status, photographs, background check information, judicial data, such as criminal records or information on other judicial or administrative proceedings.

Any information you submit through the Biomedica sites or which you otherwise share with our recruitment specialist must be true, complete, and not misleading. Purposely submitting inaccurate, incomplete, or misleading information may lead to rejection of your application during the application process or, if identified after employed with Biomedica, disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any other person's rights.

If you provide us with personal information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us. By providing personal information of another individual, you are affirming that you have obtained such consent.

## **INFORMATION WE COLLECT FROM OTHER SOURCES**

### **Information from Other Sources**

We could link the data you provide to us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally, through our company network.

For the purpose of background check reports in connection with your application, and as permitted by applicable law and/or with your consent, Biomedica could obtain information about you from other sources.

These other sources may include:

- References - details about work experience, education, skills, character, and other information or otherwise from identified references and prior employers (may be in writing or through a phone call).
- Educational Records - transcripts, diplomas, degrees, or certifications received, and letters of attendance or verification from educational or vocational institutions attended.
- Credentials - credentialing, licensing, and any exclusions statuses.

Biomedica is an equal opportunity employer, which means we offer equal treatment to all applicants. Biomedica does not discriminate, either directly or indirectly, on protected grounds: race, color, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status, or genetic information in any area of recruitment.

## **HOW WE USE YOUR INFORMATION**

Depending on your jurisdiction, we need a lawful basis in order to process your personal data.

Our legitimate interests are the evaluation of candidates and, if successful, the recruitment of staff for our business.

We use the information about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other similar roles.
- To communicate with you during the recruitment process.
- To match any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings for vacant positions.
- To send you a formal employment offer, if we determine you, as a suitable candidate.
- To help improve and develop our own recruitment processes.

## **AUTOMATED DECISION MAKING / PROFILING**

We will not use your data to make any automated decisions. We do not use technology to select appropriate candidates for Biomedica. Our selected candidates are considered based on criteria expressly identified by Biomedica, or typical in relation to the role for which you have applied. Any decision concerning who we will interview, who will proceed in the followed interview round, and who will eventually fill the job opening will always be made by our staff.

## **LAW APPLICABLE TO JOB APPLICATION**

If we share your personal information with an affiliate located in another country in its capacity as a potential employer in this location, the affiliate will handle your personal information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country where the job will be located.

## **PLACE OF DATA PROCESSING AND WAYS OF TRANSMISSION**

Biomedica is headquartered in Federal Republic of Germany, but also operates across other countries. Personal data about you may be accessible to Biomedica affiliates as well as to some Biomedica's affiliates inside and outside European Union ("EU")/European Economic Area ("EEA"), and selected vendors and partners, established in the EU/EEA or globally.

Your personal data may be accessed by staff or suppliers in, transferred to and stored at, a location outside the EU or the EEA. Where Biomedica processes personal information in countries that may not provide the same level of data protection as in the EU/EEA or in your own country, where you are resident, Biomedica will implement reasonable and appropriate legal and technical and organizational security measures with the aim to ensure the security of the processing and in particular to protect your personal data from unauthorized access, use or disclosure.

Such measures include, but not limited to, maintaining binding contractual arrangements with all third parties processing personal data of individuals, for and on behalf of Biomedica, executing, where necessary, adequate data transfer mechanisms, in the form of EU Standard Contractual Clauses (SCCs). These SCCs are used for any cross-border data transfers from the EU to controller or processors established in third countries, as adopted and approved by the

European Commission, or by the competent supervisory authorities, in the absence of an adequacy decision and/or any other data protection related certifications in place, with the aim to achieve an adequate level of data protection of the personal information of those individuals.

For residents of EEA – whenever we transfer your information outside of the EEA, we will take all reasonable steps to ensure that adequate safeguards are put in place to protect your information (unless we are permitted under applicable data protection law to make such transfers without additional formalities e.g. where the recipient country is considered an adequate destination). Such safeguards include the use of European Commission approved standard contractual clauses as mentioned above. Where appropriate we may also ask for your explicit consent.

### **CONTRACTUAL ARRANGEMENTS AND INTERNATIONAL DATA TRANSFERS**

As a data controller, Biomedica aims to establish a high level of data protection and privacy for its data subjects and partners alike. To that end, Biomedica has developed and uses specific privacy and security related language in its contractual arrangements with third party service providers acting for the benefit of Biomedica as data processors in compliance with applicable data protection legislation.

Through its privacy-compliant contractual arrangements, Biomedica sets out the scope, subject-matter, duration, and purpose of the data processing activities carried out by its data processors and their sub-processors (if any) as well as the types of personal data processed and the involved categories of data subjects. Moreover, details are provided with regard to the service provider's obligations in its role as data processor which include indicatively its confidentiality obligations, the procedure to be followed in case of a data breach incident, cooperation regarding inquiries from data subjects and authorities, assistance for the performance of data protection impact assessments, international data transfer mechanisms to be executed in the case of cross border data transfers, specific rules for the due diligence and engagement of sub-processors, implementation of appropriate security measures and personal data breach indemnification commitments.

Our service providers are required to be transparent and inform us in advance about their affiliates and any external collaborators (acting as sub processors) that might be involved in processing activities. In case that a service provider

and/or any of its collaborators, are located outside the EU and/or the EEA, we request that they also execute appropriate data transfer mechanisms with such third parties to cover any onward transfers; in particular the EU Standard Contractual Clauses (SCCs) as approved by the European Commission, in the absence of an adequacy decision and/or any other data protection related certifications. This approach establishes and maintains a high level of data protection and privacy for the individuals we interact with in the EU and beyond.

## **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the following purposes:

- Other companies or partners of Biomedica that may be based inside and outside of the Federal Republic of Germany and that may carry out centralized administrative and recruitment activities as processors and joint controllers.
- Where you have applied for a job opening through an online job board/site, we will disclose to such provider certain information, including but not limited to a unique identifier used by such provider to identify you, and information about your progress through our hiring process for the applicable job opening, and other information involving analysis of data relating to you as an applicant for employment. Service provider's Privacy Notice in respect of job board use of the Disposition Data is sole responsibility of the provider.
- Where you have applied to a job opening through another service provider, we may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by us.

## **SECURITY OF PERSONAL DATA**

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, applicable data protection laws and regulations as well as international security standards. All data you provide to us is stored on secure servers and accessed and used subject to our security policies and standards.

Biomedica has implemented reasonable physical, technical, and managerial controls and safeguards to keep your personal data protected from unauthorized access, disclosure, alteration, and destruction. Such measures may include, but are not limited to: firewalls, access controls, encryption of information while it is in storage, separation of duties, and similar security protocols. Access to your personal data is limited to a restricted number of Biomedica employees whose duties reasonably require such information and third parties with whom Biomedica contracts to carry out business activities on its behalf. Our employees have been trained on the importance of privacy and how to handle and manage personal information appropriately and securely.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

We have different retention periods for the personal data we receive from you based on privacy or other applicable laws and regulations in each jurisdiction. In any case, your personal information will be deleted upon receipt of a written request by you to us.

In the event you are offered, and you accept a job with Biomedica, your personal data will be kept in accordance with Biomedica Employees Privacy Policy, which is available to all Biomedica Employees.

## **YOUR DATA PROTECTION RIGHTS**

Under applicable laws and subject to any legal restrictions, you may have the right to request us to:

- Provide you with further details on the processing of your personal information.
- Provide you access to your personal data that we hold about you.
- Update any inaccuracies in the personal information we hold that is demonstrated to be inaccurate or incomplete.



- Delete any personal information that we no longer have a lawful basis to use.
- Provide you or a third party, with a copy of your data in a digital format (data portability).
- Stop a particular processing when you withdraw your consent.
- Object to any processing based on the legitimate interests or public interest to process information, unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights.
- Restrict certain aspects of the processing of your information.

You are also entitled to lodge a complaint with the supervisory authority for the protection of personal data of your country of residence or place of work, if you consider that your statutory rights have not been respected or that you have not received a response to your requests according to the specifications of law.

### **POLICY UPDATING**

Biomedica reserves the right to amend this Privacy Policy from time to time to reflect technological advancements, legal and regulatory changes, and Biomedica's business practices, subject to applicable laws. If Biomedica changes its privacy practices, an updated version of this Privacy Policy will reflect those changes by posting any revisions on with the respective update of the effective date listed on the bottom of this Privacy Policy. We therefore encourage you to periodically visit this page to stay informed of how we are using your personal data.

### **CONTACT INFORMATION**

If you have any questions in relation to this Privacy Policy, or you want to obtain more information about Biomedica's privacy practices, please contact our Privacy Office by email at [dp@biomedicagmbh.com](mailto:dp@biomedicagmbh.com)

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