

## RECRUITMENT CANDIDATE PRIVACY NOTICE

This site is operated by Vectura Fertin Pharma, Inc. Philip Morris International Inc., is the parent company of Vectura Fertin Pharma, Inc. Throughout this notice, the terms "Philip Morris International," "PMI," "PMI subsidiaries," "we," "us" and "our" refer, as appropriate in the context, to Philip Morris International Inc., or one or more of its subsidiaries, including Vectura Fertin Pharma, Inc.

We take privacy seriously. This notice tells you who we are, what information about you we collect, and what we do with it. We will use information about you only in accordance with applicable data protection laws. Click on "*find out more*" in each section for further information.

In the section introduced as "What rights and options do you have?", you can also find information about your rights.

### How do we collect information about you?

We may collect information about you in various ways.

- You may provide us with information directly (e.g., when creating an account, creating a candidate profile, applying for a job, attending an interview, completing a test/assessment, sending an e-mail, or making a call to us).
- We may collect information automatically.
- We may acquire information from third parties (e.g., from recruitment agencies, reference providers, (where permitted by law) background screening providers and publicly-available sources, such as a company website, internet searches or social media platforms such as LinkedIn).

### Find out more...

We may collect information that you provide directly. Typically, this will happen when you:

- Sign up to be a member of our databases (this could be, for example, in person, via app, or online when you create an account and a candidate profile);
- Submit a job application and supporting information to us;
- Participate in an interview;
- Complete a test/assessment;
- Provide job acceptance, background screening and on-boarding information (where applicable);
- Download, or use, a digital touchpoint (e.g., an app or a website);
- Contact us by e-mail, social media or telephone;
- Register to receive press releases, e-mail alerts, or job updates;
- Participate in surveys or (where permitted by law) competitions or promotions.

We may also collect information about you automatically. Typically, this will happen when you:

- Visit our offices (e.g., through video (CCTV) recording and building access logs);
- Complete online skills and aptitude tests;
- Communicate with us (for example by e-mail, or social media platforms);
- Make public posts on social media platforms that we follow (for example, so that we can understand public opinion).

We may also collect information about you automatically through the use of cookies and similar tracking technologies. To learn about the cookies (including Google analytics cookies) and similar technologies used on a touchpoint, including how you can accept or refuse cookies, please see the cookie notice made available on or through that touchpoint.

Where permitted by law, we may acquire information about you from third parties. This may include:

- Information from recruitment agencies;
- Information shared between our affiliates;
- Information from third party social media sites (for example, if you choose to simplify your login process to the job platform to allow direct access once you have signed in to your third party social media account, like Gmail or Yahoo!, or if you want to upload information to the platform (for example, from LinkedIn) instead of manually completing an application);
- Publicly-available profile information (such as your experience, skills and interests) on third party social media sites (such as LinkedIn).

We may also collect information in other contexts made apparent to you at the time.

### **What information about you do we collect?**

We may collect various types of information about you:

- Information necessary to manage and administer our relationship with you (including, where we agree, to reimburse certain expenses to attend interview) and to run our business, including to meet our legal and regulatory obligations (e.g., verifying your identity, your right to work, application details and, where permitted by law, your suitability for a job using background checks);
- Information you give us in your candidate profile, job application, forms or surveys;
- Information necessary to assess your eligibility for a role, shortlist and select candidates;
- Information about your visits to our offices and attendance at events;
- Where applicable, information necessary to offer you a job and on-board you (such as issuing an offer, drafting an employment contract, providing benefits information and arranging access to systems);
- Information gathered as part of our monitoring of the recruitment process;
- Information you give us in calls you make to us or e-mails you send to us;
- Information about your preferences, interests and career aspirations;
- Information gathered as part of business analytics and improvements.

### ***find out more...***

Information that we collect from you directly will be apparent from the context in which you provide it. For example:

- During the application and recruitment process, you provide your name, contact details, skills, qualifications, experience information, and, where we agree, information (such as your bank account details) to allow us to reimburse certain expenses to attend interview);
- During any interview or assessment you provide answers to questions;
- You may provide information on your career aspirations and interests so that we can send you relevant opportunities;

- We may collect information that enables us to verify your identity and right to work, for example a copy of an identity document or your facial image.

Information that we collect automatically will generally concern:

- Details of your visits to our offices, attendance at interviews, assessments and events (such as time and duration);
- Your devices (such as IP address or other unique device identifier, location data, details of any cookies that we may have stored on your device).

Information that we collect from third parties will generally consist of:

- Job application information from recruitment agencies (where you apply for a role via a recruitment agency);
- References and work certificates from your previous employers or your other reference providers;
- Where permitted by law, background screening information as appropriate for the role (such as identity document validation, address verification, confirmation of qualifications and employment history, searches against sanctions and politically exposed persons lists, and details of any convictions);
- Login information and profile information from third party social media sites (for example, if you choose to simplify your login process to the job platform to allow direct access once you have signed in to your third party social media account, like Gmail or Yahoo!, or if you want to upload information to the platform (for example, from LinkedIn) instead of manually completing an application);
- Publicly-available profile information (such as your role, skills, qualifications, experience and interests, for example from a company website, internet searches or on social media platforms such as LinkedIn).

Information we collect and process about you may include your:

- Name;
- Password;
- Address including home and correspondence;
- Contact details including personal e-mail address and home/personal mobile phone number where these details are provided as part of your application;
- Sex/gender;
- Cover letter;
- Resume/job application, including personal and professional information;
- How you heard about the job;
- Eligibility to work, including passport or other official identification document;
- References;
- Qualification transcripts and certificates;
- Education and employment history;
- Information about military service;
- Other jobs applied for;
- Current, expected and offered employment terms and conditions (e.g., pay, hours of work, holidays, benefits);
- Interview notes and assessment results;

- Application outcome and reason;
- Reason for withdrawing your job submission (where applicable);
- Social insurance and personal income tax data;
- Tax code;
- Date of birth;
- Family status and situation;
- Bank account information (if we agree to reimburse you certain expenses to attend interview, or if you are offered a job and accept it);
- Photographs and video recordings;
- System user information;
- Information about your visits to our offices and events.

We may also collect and process special categories of information about you such as your:

- Racial or ethnic origin (e.g., for equal opportunities monitoring);
- Political opinions (only if you voluntarily share this information);
- Religious or philosophical beliefs (e.g., for reasonable accommodation);
- Sexual orientation (e.g., for equal opportunities monitoring or if you voluntarily share this information);
- Trade union membership (only if you voluntarily share this information);
- Data concerning your health, including any disability (e.g., for reasonable accommodation).

We will process these types of data if you voluntarily share them with us, if we have a legal obligation to process the information and, in relation the recruitment process, to provide reasonable accommodation.

### **For what purposes do we use information about you, and on what legal basis?**

In this section, we describe the purposes for which we use personal information. However, this is a global notice, and where the laws of a country restrict or prohibit certain activities described in this notice, we will not use information about you for those purposes in that country.

Subject to the above, we use information about you for the following purposes:

- Perform checks on identity, role eligibility and right to work;
- Verify employment history, qualifications, experience and references;
- Where permitted by law, perform candidate vetting and background screening;
- Perform recruitment and selection, including interviews, assessments, and psychometric profiling, shortlisting, job offer and benefits (where applicable);
- Business administration, including record keeping obligations;
- Where applicable, administration of reimbursement of expenses to attend interview;
- Where applicable, pre-employment administration and management, including preparation of contractual and non-contractual documents, and arranging systems and building access;
- Monitoring of the recruitment process.

The legal basis for our use of information about you is one of the following (which we explain in more detail in the “find out more” section):

- Compliance with a legal obligation to which we are subject;
- To take steps at your request prior to entering into a contract;
- A legitimate business interest that is not overridden by interests you have to protect the information;
- Where none of the above applies, or where law requires it, your consent (which we will ask for before we process the information).

### ***find out more...***

The purposes for which we use information about you, with corresponding methods of collection and legal basis for use, are:

Where we do not base our use of information about you on one of the above legal bases, or where law requires it, we will ask for your consent before we process the information (these cases will be clear from the context). We may from time to time ask for your explicit consent to process special categories of information about you.

In some instances, we may use information about you in ways that are not described above. Where this is the case, we will provide a supplemental privacy notice that explains such use. You should read any supplemental notice in conjunction with this notice.

### **Do we make any automated decisions?**

We may make automated decisions on any of the matters set out in this notice (for example, whom to include on a shortlist for interview). If we do this, we will draw this to your attention at the time, together with information about the logic involved in the decision, as well as the significance and the envisaged consequences for you of such use of information about you.

### **Who do we share your information with, and for what purposes?**

We may share information about you with:

- Our affiliates;
- Third parties who provide our affiliates or you with products or services (such as recruitment agencies, background screening and online assessment providers);
- Other third parties, where required or permitted by law (such as regulatory authorities; government departments; past, potential or future employers; and in the context of organisational restructuring).

We share information about you with others only in accordance with applicable laws. Thus, where law requires your consent, we will first ask for it.

## How do we protect information about you?

We implement appropriate technical and organisational measures to protect personal information that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. We also require our service providers to comply with equivalent data privacy and security requirements.

## How long will information about you be kept?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected. After that, we will delete it. The period will vary depending on the purposes for which the information was collected. Note that in some circumstances, you have the right to request us to delete the information. Also, we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

### *find out more...*

Typically, we retain data based on the criteria described in the table below:

Type	Explanation/typical retention criteria
<ul style="list-style-type: none"><li>recruitment process data</li></ul>	<p>If you apply for a job with us, we will keep a record of your application and retain it while it remains relevant to our relationship, for example during the recruitment process, to tell you about other opportunities that may be of interest and, if your application is successful, during your employment with us.</p> <p>Typically, information about you is kept for up to 12 months after the date on which you last logged into the recruitment platform. As a minimum, we keep records of the recruitment process for the statutory period in which a claim arising from the recruitment process may be brought. We may keep information about you for longer if you apply for certain types of jobs and this is allowed or required in the country where that job is based.</p> <p>Other records relevant to the recruitment process (for example, assessment results and background checks) are retained for a short period until more permanent records are made (for example, a record of the result of the assessment or background check).</p>
<ul style="list-style-type: none"><li>visitor records</li></ul>	<p>If you visit our buildings, visitor records are retained typically for a period of only a few months.</p>
<ul style="list-style-type: none"><li>CCTV</li></ul>	<p>If you visit our buildings, CCTV records are retained typically for a period of only a few days.</p>
<ul style="list-style-type: none"><li>system audit logs</li></ul>	<p>System audit logs are retained typically for a period of only a few months.</p>

## What rights and options do you have?

You may have some or all of the following rights in respect of information about you that we hold:

- Request us to give you access to it;
- Request us to rectify it, update it, or erase it.

**If you wish to exercise these rights, email your recruitment contact.**