

## **Introduction**

Porton Biopharma Limited (“we”, “us” or “our”) are committed to protecting and respecting candidate privacy. The Company recognises its responsibility to all data subjects under the General Data Protection Regulation (GDPR) and is committed to processing data securely and transparently. This privacy notice sets out the Company’s obligations to individuals seeking, and applying for, employment with the Company.

Porton Biopharma Ltd is a data controller. Resultantly the Company is responsible for the collection and processing of personal data.

The Company’s Data Protection Officer holds responsibility for overseeing the businesses data processing activities. The DPO’s details are outlined below:

Sue Selby, DPO, Manor Farm Road, Porton Down, Salisbury, Wiltshire, SP4 0JG

## **General Data Protection Regulation Key Principles**

The Company commits to processing applicant data in line with GDPR key principles:

- Data collected shall be processed fairly, lawfully, clearly and transparently;
- Data will be used only for the purposes for which it was collected;
- The Company shall only collect data which is required for the purposes upon which it is collected for;
- Data will be stored and kept as accurately as is possible for the duration it is retained;
- The Company will only retain personal data for as long as it is required need it; after which it shall be securely destroyed;
- Data will be treated with the highest level of confidentiality and held securely.

## **Lawful basis for processing**

Our purpose for processing applicant personal data is to assess suitability for roles, and to assist the Company with continuous improvement in relation to our recruitment process.

Under article 6(1)(b) of the GDPR, the Company reserves the right to collect data where processing is necessary for the performance of a contract to which the data subject is party; or in order to take steps at the request of the data subject prior to entering into a contract.

Under the Equality Act 2010, should a candidate require reasonable adjustments during the application process due to a protected characteristic, the Company has

lawful basis for collating data under article 6(1)(c) of the GDPR for processing which is necessary for compliance with a legal obligation to which the Company is subject.

This section is not exhaustive, and the Company reserves the right to lawfully process data in line with the GDPR, and other employment acts.

### **Data that we collect**

The Company collects applicant data which is required for the purposes of a fair recruitment process, and to measure candidate suitability in line with available vacancies.

At application stage, the Company will collect the following information:

- Name and contact details, including contact number and email address;
- Previous work experience and history;
- Qualifications;
- Education;
- UK right to work eligibility;
- Current salary, and
- Equal opportunities information- this is not mandatory and will not affect the application if not provided. Hiring managers will not be in receipt of this information and it is only used to analyse equal opportunities statistics.

In addition to the above, if a candidate is successfully shortlisted, they will be offered an interview. the Company will also collect the following data:

- Any competency or personality assessment results that the Company requires the candidate to undertake as part of their application;
- Proof of right to work in the UK;
- Reference details;
- Data from third parties including agencies and credit reference agencies;
- Declaration of any previous convictions or cautions;
- Any relevant disability data;
- National insurance number;
- Valid driving license (if applicable);
- Proof of current address; and
- Proof of qualifications.

Should a candidate be successful in securing a role with the Company, they shall be provided with a conditional offer which will feature a separate privacy notice that will detail the data required to enable the Company to issue a formal offer, and for the purposes of delivering the proper performance of your contract.

Candidates are not obligated to provide any personal information to the Company at application stage; however, failure to provide suitable information could impact on the Company's recruitment decisions.

### **How we collect data**

The Company utilises a variety of channels when advertising; to enhance the number of suitable applications, and to ensure that roles are publicized to as diverse range of candidates as possible.

The Company has partnerships with a select group of recruitment agencies who may be instructed to recruit on the Companies behalf. The agency will submit personal data to the Company, and the Company shall process the data in line with this privacy notice. Should a candidate be submitted via a recruitment agency, the Company recommends that they familiarise themselves with the agency's privacy notice.

The Company conducts its own recruitment activities utilising job board systems, including TotalJobs, Pharmiweb.Jobs and CTP Military recruitment. Candidates utilising these systems should familiarise themselves with their privacy notices.

The Company is aware of aggregator job sites, such as Indeed, advertising roles which they have obtained from the Company website. This is an automatic service, and one the Company is unable to control. Any data submitted from aggregator sites will be managed in line with the privacy notice.

Candidates are welcome to apply for available vacancies directly, by submitting their CV and covering letter to [recruitment@portonbiopharma.com](mailto:recruitment@portonbiopharma.com).

### **Protecting and secure data processing**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. All applicant data collected is stored within the secure Company IT systems, which is compliant with the GDPR. Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

The Company has suitable controls in place to secure against accidental loss, disclosure, destruction or abuse of personal data. Data storage is regulated by the GDPR and current domestic legislation. Standards are set out in the Regulation and the current Data Protection Act and one of the key points for consideration in a data transfer situation is that personal data must not be transferred to a country/territory outside the European Economic Area (EEA) unless that country/territory ensures appropriate safeguards.

### **Data retention**

It is necessary for the Company to retain applicant data as evidence of fair and ethical recruitment practices, and to strive for continuous improvement. The Company also retains candidate data in order to provide information about future vacancies to interested candidates.

Should an applicant be unsuccessful in securing the vacancy for which they have applied, the Company will retain their data for 12-months after the vacancy is successfully filled. After 12-months, the data will be securely deleted.

In the event a candidate is successful in securing a role with the Company, the data supplied at recruitment stage will be supplemented to their overall recruitment file. Further privacy notice information shall be provided at point of offer.

### **Your rights under the General Data Protection Regulation**

Data subjects, or applicants, have certain rights under data protection law:

- Applicants have the right to request access, or copies of, any personal data that the Company holds on them. This is commonly known as a Subject Access Request (SAR). This request can be submitted in writing, or verbally;
- Applicants have the right to request that the Company rectifies information held that is either incorrect or incomplete;
- Applicants have the right to request that their personal data is removed. Whilst the Company will comply to such an extent as possible, the Company may be required to retain applicant data to comply with other regulations. Should this be the case, the applicant will receive a full explanation of the reasons for non-compliance in writing;
- Applicants have the right to object to the processing of their personal data;
- Applicants have the right to request a data porting.

Should an applicant wish to exercise any right outlined above, they should refer to the contact details provided at the bottom of the page.

### **Sharing of data and recruitment decisions**

Applicant data will be shared with relevant parties within the Company, where it is necessary for them to undertake their duties with regard to recruitment. This includes the HR and Recruitment department, Recruitment Managers, Panel members and Department Directors.

Recruitment decisions are made by a panel of recruiting managers, using shortlisting methods which are designed to encourage fairness and equal opportunities.

### **Changes to the privacy notice**

Porton Biopharma Ltd's privacy policy remains under regular review, we reserve the right to update this notice at any time.

### **Complaint**

In the event an applicant is not satisfied with the way that Porton Biopharma Ltd has processed their data, they should refer to the details outlined below:

<b>Contact details</b>	
Name	Porton Biopharma Ltd
Address	Manor Farm Road, Salisbury, SP4 0JG
Phone Number	01980 551564
E-mail	recruitment@portonbiopharma.com

Should the applicant continue to remain dissatisfied, they have the right to complain to the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues.