

	<p align="center">Document Title Privacy Notice for Recruitment</p>	<p align="center">Document Type & No. HRDOC-DOC-0017</p>
		<p align="center">Revision 1</p>

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This Privacy Notice outlines the type of information that is collected by SPD about our job applicants and candidates on the Applicant Tracking System Networkx and website (“Networkx”) and how SPD uses and protects this information. SPD consists of SPD Swiss Precision Diagnostics GmbH and SPD Development Company Limited (“SPD”).

SPD is committed to being transparent about how it collects and uses your personal data. For the purposes of data protection law, SPD is the company that controls the processing of your personal data provided on the Applicant Tracking System and website. This system and website is operated by Networkx.

Information we collect

We will only collect and process a range of information specifically and voluntarily provided by you. Such information includes:

- your name, address and contact details, including email address and telephone number
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers
- other information you provide to us in support of an application and recruitment process
- any sensitive and/or demographic information obtained during the application or recruitment process such as gender, information about your citizenship and/or nationality, and/or your racial or ethnic origin
- reference information and/or information received from background checks (where applicable), including information provided by third parties

In addition to the personal information you provide, we may also collect, and store metadata associated with any files you submit (such as pictures, videos). This metadata can include details such as file creation and modification dates, and technical attributes. SPD will not generally use this metadata apart from storing it. If you prefer not to share this metadata with SPD, we recommend scrubbing the data before sharing.

Why we process your personal data

By providing your information for a job application advertised by SPD on the Networkx system and website, you accept the terms of this policy and agree to the processing of your personal data.

The legal basis for collecting and using Candidate Personal Information, including Sensitive Personal Information, is our legitimate interest in running the application and recruitment process, compliance with a legal obligation, or the performance of a contract, depending on the stage of the recruitment and onboarding process.

Processing applicants’ data allows us to:

- deal with your application
- communicate with you regarding your application
- carry out recruitment activities
- may be used to contact you about other vacancies

Where we process special categories of personal data, such as information about ethnic origin or religion or belief, this is done to meet our obligations on equal opportunities monitoring.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data
- change incorrect or incomplete data
- require SPD to delete, stop or object to the processing of your data, for example where the data is no longer necessary for the purposes of processing described above

If you would like to exercise any of these rights, you can access your personal profile by using your secure login at any time.



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If you believe that SPD has not complied with your data protection rights, you can complain to the Information Commissioner (information available at www.ico.org.uk).

How we use your information

Personal details you provide for an application will be used by SPD for the specific purpose for which it was collected, including without limitation as follows:

- to deal with your application
- to communicate with you regarding recruitment
- to satisfy legal requirements
- to contact you about future vacancies

Please note that SPD will release your Personal Information if required to do so by law, or by search warrant, subpoena or court order. Your Personal Information may be accessible to law enforcement and security authorities under local law in certain countries.

Security of your information

SPD takes the security of your data very seriously. We have internal systems, policies and controls in place to protect your data from being lost, accidentally destroyed, misused or unlawfully disclosed. These are intended to ensure that your data is accessed only by appropriate SPD representative and only for the performance of their legitimate business duties.

Transfer of information outside your country of residence

Any information you provide may be transferred outside of your country of residence to SPD, its affiliates or third-party companies retained by SPD, its affiliates and their suppliers. Those countries may not have the same data protection laws as the country you are in. If we transfer your information to other countries, we will protect that information as described in this policy and will comply with applicable legal requirements in the receiving country.

Retention period

We will retain your Personal Information for a period of 6 months following the conclusion of the advertised recruitment process e.g. after the vacant role has been successfully filled, or the advertised role withdrawn, unless a different retention period is required by law.

Automated decision-making

No decisions associated with your application are made using automated decision-making systems or processes.

Information provided for other jobs advertised on the Networkx website

This policy applies only to information provided in response to jobs advertised by SPD. SPD is not responsible for the processing of information provided by you in response to jobs advertised by other companies on the Networkx website or by Networkx on behalf of other companies. SPD cannot guarantee the privacy policies of these other companies, and we recommend you consult the privacy policies of such companies and/or Networkx directly.

Who to contact

If you have any comments or questions about this policy or wish to report any violations of the policy, please email HR at SPD hr@spdspark.com.