

# Sirius Therapeutics - Recruitment Privacy Notice

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## Introduction

Sirius Therapeutics ("Sirius", "We, "Our" or "Us") is committed to protecting the privacy and security of your Personal Data.

This Privacy Notice is intended for recruitment candidates located within the European Union (EU), European Economic Area (EEA), or United Kingdom (UK).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information.

You have been directed to or otherwise sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). This notice makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under Data Protection Legislation and explains how your Personal Data will be processed.

Personal Data means any information or piece of information which could identify you either directly (e.g. your name) or indirectly (e.g. a unique ID number).

If anything in this Privacy Notice conflicts with local law in your jurisdiction, local law prevails.

## The controller of your Personal Data

Sirius Therapeutics are the Data Controller for the Personal Data that we process about you during recruitment process.

Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, the Data Protection Legislation means the General Data Protection Regulation (Regulation (EU) 2016/679) ('EU GDPR'). This includes any replacement legislation coming into effect from time to time. Depending on your location, additional legislation might also apply.

In the UK, Data Protection Legislation means the Data Protection Act 2018 ('DPA 2018'), United Kingdom General Data Protection Regulation ('UK GDPR'), the Privacy and Electronic Communications (EC Directive) Regulations 2003 ('PECR') and any legislation implemented in connection with the legislation mentioned above.

We have appointed a Data Protection Officer (DPO) to help us monitor internal compliance, inform and advise on data protection obligations, and act as a point of contact for data subjects and supervisory authorities. We have also designated an EU GDPR Representative. To locate the relevant contact details, please see the Contact Us section below.

## The Personal Data we collect about you

Personal Data Category	Personal Data
Basic information	Your name (including prefix or title), gender, civil status, age and date of birth
Contact information	Any information you provide to us that allows us to contact you, e.g. your personal or business email address, personal or

	business mailing address, personal or business telephone numbers, emergency contact information
<b>National identifiers</b>	Your national ID, passport details, driving licence details, residency and work permit status, national insurance number, or other taxpayer/government identification number
<b>Recruitment information</b>	Information related to your education, work experience, references, and referees. Information relating to education and academic achievements as well as professional qualifications. Information contained in application forms and resumes, such as education, educational and professional qualifications (including certificates and training records), languages and other relevant skills. Information as a result of background checks (including credit checks and criminal record checks, where applicable). Information relating to interviews, including notes, audiovisual recordings, etc.
<b>Financial information</b>	your salary, pension, stock options, stock grants and other awards, effective date of current compensation, salary reviews, bank details and bank account number, retirement account information, company allowances, bonus, benefits, insurance details
<b>Dependant information</b>	Information related to your dependants, e.g. the first and last names, dates of birth, and contact details of your spouse/partner, children, next of kin, and any other dependants
<b>Expenses information</b>	Information included in your expense reports and information needed by Sirius Therapeutics to process such reports according to its policies, e.g. places you have been to for business, invoices, car licence plate number
<b>Audiovisual recordings</b>	We may collect photographs, video and audio recordings of you, e.g., recording videoconference meetings, or when you upload or share your photographs and videos for recruitment purposes
<b>Infrastructure interactions</b>	Information generated by Sirius Therapeutics to enable the use of our IT assets, products, systems, networks and communication channels. Information related to your use of our IT assets, products, systems, network services and communication channels, such as laptops, desktops, tablets and mobiles issued by us, Internet/Website use and access, corporate email, or provided tools or applications
<b>Opinions</b>	Information you provide when you participate in our surveys or conversation channels
<b>Special Category Personal Data</b>	Information related to your: <ul style="list-style-type: none"> <li>• race and ethnicity</li> <li>• religious or philosophical beliefs</li> <li>• health</li> <li>• sexual orientation</li> </ul>
<b>Criminal Convictions and Offences Data</b>	Information related to your unspent criminal convictions and offences.

You can decide whether to give us special categories of information if we ask you for them. If you decide not to share these with us, please be assured this does not affect your application.

You can also choose not to give us the other types of Personal Data when we ask you for them. If you decide not to give us your Personal Data, we may not be able to assess or consider your application.

If you give us the Personal Data of another person, e.g. your spouse/partner or referees, we assume you have their permission to share their data with us.

## How we collect your Personal Data

We collect your Personal Data when you:

- Apply for a job at Sirius Therapeutics and participate in our recruitment process;
- Interact with our Human Resources team;
- Sign up to receive open job posts;
- Otherwise provide it to us.

We will also collect your information through:

- Recruitment agencies;
- Background and pre-employment check providers;
- Credit reference agencies;
- Your named referees; and,
- Social media platforms (such as LinkedIn) or other publicly available sources.

## How we use your Personal Data

Personal Data Category	Lawful Basis	Purpose
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Contact information</li> <li>• Recruitment information</li> <li>• National identifiers</li> <li>• Audiovisual recordings</li> <li>• Infrastructure interactions</li> <li>• Opinions</li> <li>• Criminal Convictions and Offences data</li> </ul>	<p>Our <b>Legitimate Interest</b> in recruiting talent</p> <p><i>GDPR, Article 6(1)(f)</i></p>	<p><b>Recruitment</b></p> <p>For recruitment purposes, including, but not limited to: suitability reviews (applications, CVs, interviews); maintaining recruitment records; screening, background checks, credit checks, and criminal record checks; and, sourcing references, where applicable.</p>
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Contact information</li> <li>• Recruitment information</li> <li>• National identifiers</li> <li>• Financial</li> </ul>	<p><b>Contractual Obligation</b></p> <p><i>GDPR, Article 6(1)(b)</i></p>	<p><b>Successful Recruitment</b></p> <p>For successful recruitment purposes, including, but not limited to: verification of identification documentation; collecting personal, financial, and health information to prepare for your forthcoming employment.</p>

<ul style="list-style-type: none"> <li>information</li> <li>• Infrastructure interactions</li> <li>• Special Category Personal Data (health)</li> </ul>		
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Contact information</li> </ul>	<b>Contractual Obligation</b>  <i>GDPR, Article 6(1)(b)</i>	<b>Communication</b>  Communicating with you and facilitate your communication with others.
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• National identifiers</li> <li>• Recruitment information</li> <li>• Financial information</li> <li>• Special Category Personal Data (health)</li> </ul>	<b>Legal Obligation</b>  <i>GDPR, Article 6(1)(c)</i>	<b>Legal Obligations</b>  For the purposes of complying with legal, regulatory and other requirements, including, but not limited to: checking Right to Work documentation; reviewing vehicular insurance and associated documentation; complying with local employment, social security and occupational health laws and regulations; record-keeping and reporting obligations; and, complying with government inspections and other requests from government or other public authorities.
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Contact information</li> <li>• Dependant information</li> <li>• Special Category Personal Data (health)</li> </ul>	<b>Vital Interest</b>  <i>GDPR, Article 6(1)(d)</i>	<b>Vital Interest</b>  Monitor your health in order to safeguard and protect you, or to act in your vital interest, or the vital interest of a third party.
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Contact information</li> <li>• Employment information</li> </ul>	<b>Our Legitimate Interest</b> in maintaining a candidate pool  <i>GDPR, Article 6(1)(f)</i>	<b>Retaining Unsuccessful Candidate Data</b>  Retaining your candidate information in order to potentially invite you to apply for a similar role in the future.
<ul style="list-style-type: none"> <li>• Basic information</li> <li>• Special Category Personal Data (Ethnicity, Religious or Philosophical Beliefs, Health data, Sexual Orientation)</li> </ul>	<b>Public Interest</b>  <i>GDPR, Article 6(1)(e)</i>	<b>Equal Opportunity Monitoring</b>  Where you are applying to Sirius Therapeutics, we may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual orientation, for equal opportunity monitoring and reporting purposes. You can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, if we require references for

this role and you fail to provide us with relevant details, we will not be able to take your application further.

## How we use particularly sensitive Personal Data

### Special Category Personal Data

Special Category Personal Data	Condition for Processing	Purpose
<ul style="list-style-type: none"> <li>Health data</li> </ul>	<b>Employment Law</b> <i>GDPR, Article 9(2)(b)</i>	<b>Reasonable Adjustments</b>  We may use information about your health or disability status to consider whether we need to provide reasonable adjustments to your recruitment or interview process (e.g., if you are disabled).
<ul style="list-style-type: none"> <li>Health data</li> </ul>	<b>Vital Interest</b> <i>GDPR, Article 9(2)(c)</i>	<b>Vital Interest</b>  To act in your vital interest, or the vital interest of a third party.
<ul style="list-style-type: none"> <li>Ethnicity</li> <li>Religious or Philosophical Beliefs</li> <li>Health data</li> <li>Sexual Orientation</li> </ul>	<b>Substantial Public Interest</b> <i>GDPR, Article 9(2)(g)</i>	<b>Equal Opportunity Monitoring</b>  We may use information about your ethnicity, religious or philosophical beliefs, health data (including any disabilities), or sexual orientation, for equal opportunity monitoring and reporting purposes, in accordance with applicable law or best practice. You can opt out of equal opportunity monitoring at any time by using the contact details provided in the Contact Us section below.

### Criminal convictions and offences data

Depending on the jurisdiction in which you operate and on your specific role, we may collect information about your criminal convictions and offences if we offer you a position with us and you accept (conditional on checks and any other conditions, such as references, being satisfactory). We do this to satisfy ourselves that there is nothing in your criminal convictions and offences history which makes you unsuitable for the role. Our roles require a high degree of trust and integrity, and it is therefore best practice to undertake such checks and a pre-requisite in some instances.

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We have in place appropriate policies and safeguards which we are required by law to maintain when processing such data.

### Automated decision making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## How long we keep your Personal Data

We will retain your Personal Data for no longer than twelve (12) months after we have communicated to you our decision about whether to appoint you. We retain your Personal Data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your Personal Data in accordance with our data retention policy and relevant Data Protection Legislation.

If we wish to retain your Personal Data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your Personal Data for an additional twelve (12) months. If we do not contact you twenty-four (24) months after the end of your last application, we will delete the data. You have the right to withdraw your consent for processing for this purpose at any time. To withdraw your consent, please contact us as set out below.

## The recipients of your Personal Data

We will only share your Personal Data with the following third parties for the purposes of processing your application: recruitment agencies, our HR management and recruitment system and parties involved with pre-employment checks, VISA applications and so on. All our third-party service providers are required to take appropriate security measures to protect your Personal Data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International transfers of your Personal Data

Sirius Therapeutics uses service providers in multiple countries. Therefore, we may need to transfer and use your Personal Data outside of the country where we collect it from you. We implement appropriate measures to protect your Personal Data when we transfer your Personal Data outside of your home country. This includes appointment of an EU GDPR Representative to handle local data queries, as well as having appropriate agreements in place to protect your data, such as data transfer agreements that incorporate standard data protection clauses. You can request a copy of the standard contractual clauses we use from our DPO using the contact details in the Contact Us section below.

## How we protect your Personal Data

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. If you would like additional assurances regarding how we process data securely, please contact us as set out below.

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

## Your rights regarding your Personal Data

You have rights we need to make you aware of. You may have the right to:



- Ask us for copies of your Personal Data. There are some exceptions, which means you may not always receive all the information we process;
- Ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Ask us to delete your Personal Data, in certain circumstances;
- Ask us to restrict the processing of your information;
- Object to our processing of your Personal Data;
- Ask that we transfer information you have given us from one organisation to another, or to give it to you;
- Withdraw your consent, where you have previously provided it to us; and
- Complain to your local data protection authority.

To exercise any of these rights, you can contact us using the information in the Contact Us section below.

For your protection, and to protect the privacy of others, we may need to verify your identity before complying with your Request.

If you object to us using your Personal Data or withdraw consent for us to use your Personal Data, after initially giving it to us, we will respect your choice in line with the applicable law. However, by objecting or withdrawing your consent, we may not be able to complete the recruitment and pre-employment screening activities described above.

If you are in the UK, you have the right to make lodge a complaint at any time to the Information Commissioner's Office (ICO) <https://ico.org.uk/>, the UK supervisory authority for data protection.

If you are in the EU or EEA, you also have the right to lodge a complaint at any time with the relevant supervisory authority responsible for data protection. For a list of the relevant supervisory authorities, please see [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)

## Our responsibility regarding websites and applications that we do not own or control

Our careers portal and recruitment pathway may contain links to websites or mobile applications we do not own or control. Our Privacy Notice does not cover this processing. Please read the privacy notices on those websites and mobile applications if you would like to find out how they collect, use and share your Personal Data.

## Updates to this Privacy Notice

We may change this privacy notice from time to time (for example, if the law changes). We recommend that you check this notice regularly to keep up-to-date.

## Contact Us

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this notice, the way your Personal Data is processed, or the wider data protection practices of Sirius Therapeutics, please contact us by one of the following means:

Our Data Protection Officer (DPO): [dpo@siriusrna.com](mailto:dpo@siriusrna.com)

Our EU GDPR Representative: The DPO Centre Europe Limited, [EUrep@siriusrna.com](mailto:EUrep@siriusrna.com)



Thank you for taking time to read this privacy notice.