

Candidate Privacy Notice

SCOPE OF PRIVACY NOTICE

Like most businesses, Optum Venture Global Management UK Limited (“Optum Ventures”) collect and process personal data relating to job applicants as part of our recruitment processes. This Privacy Notice sets out the basis on which we collect, use and disclose the personal data of our job applicants, as well as your rights in respect of such personal data.

This Privacy Notice is set out in this document (the Core Notice) and the Supplementary Information in the annex to this document.

In the Supplementary Information, we explain what we mean by “personal data”, “processing”, “sensitive personal data” and other terms used in the notice.

1. In brief, this notice explains:
 - what personal data we hold and why we process it;
 - the legal grounds which allow us to process your personal data;
 - where the data comes from, who gets to see it and how long we keep it;
 - how to access your personal data and other rights;
 - how to contact us.

In the case, where your application is successful and you become an employee of Optum Ventures, a separate privacy notice is provided to you.

Personal data – what we hold and why we process it

2. We process data for the purposes of our business including management, administrative, employment and legal purposes. Optum Ventures collect a range of information about you. This includes:
 - Contact details such as your name, title, addresses, telephone numbers and email addresses;
 - Details of your qualifications, skills, experience, references and employment history;
 - Evidence of your right to work in the UK and immigration status;
 - Diversity and equal opportunities monitoring information, which can include information about your race or ethnicity, religion, sexual orientation, health or disability;
 - Information about your current level of remuneration and benefit entitlements;

- Evidence of how you meet the background check criteria, including copies of driving licence, passport, proof of current address, credit check reports, DBS disclosures and any personal information provided in that process.

We need this data to progress your application, get in contact with you, or send you notifications of a vacancy.

The Supplementary Information provides more specific information on processing purposes, on the type of data that may be processed and on the grounds on which we process data. See *Legal grounds for processing personal data* and *Further information on the data we process and our purposes*.

Where the data comes from and who gets to see it

3. Some of the personal data that we process about you comes from you. For example, you tell us your contact details and provide us with information on your CV, application or profile. Data may be obtained through passports, other identity checks, or collected through interviews.
4. We may also collect information from third parties. These include former employers, credit reference agencies, the Disclosure and Barring Service (DBS), or other background check agencies.
5. Your personal data will be seen internally by managers, HR and, in some circumstances, colleagues for the purposes of the recruitment process.

Further information on this is provided in the Supplementary Information. See *Where the data comes from* and *Who gets to see your data?*

How long do we keep your personal data?

6. We do not keep your personal data for any specific period but will not keep it for longer than is necessary for our purposes. If your application for employment is unsuccessful (including when you have speculatively applied to us), we will hold your data on file for 12 months. At the end of that period, your data is deleted or destroyed (unless we need to retain it for longer to exercise or defend any legal claims).
7. Where an application is successful, in general, we will keep your personal data for the duration of your employment and for a period afterwards. In that case, the periods for which employee data is held will be provided to you in a separate privacy notice.

See *Retaining your personal data – more information* in the Supplementary Information.

Transfers of personal data outside the EEA

8. We may transfer your personal data outside the EEA to members of our group.

Further information on these transfers and the measures taken to safeguard your data are set out in the Supplementary Information under *Transfers of personal data outside the EEA – more information*.

Data security

7. We have put in place measures to protect the security of your information. We have internal policies and compliance protocols in place to ensure that your data is not lost, misused or disclosed or accessed without due authorisation.

Your data rights

8. You have a right to make a subject access request to receive information about the data that we process about you. Further information on this and on other rights is in the Supplementary Information under *Access to your personal data and other rights*. We also explain how to make a complaint about our processing of your data.

Contact details

9. In processing your personal data, we act as a data controller. If you have any comments, questions or concerns our contact details are as follows:

Heather Roxborough, Partner heather@optumventures.com

SUPPLEMENTARY INFORMATION

What do we mean by “personal data” and “processing”?

10. “Personal data” is information relating to you (or from which you may be identified) which is processed by automatic means or which is (or is intended to be) part of a structured manual filing system. It includes not only facts about you, but also intentions and opinions about you.

Data “processed automatically” includes information held on, or relating to use of, a computer, laptop, mobile phone or similar device. It covers data derived from equipment such as access passes within a building, data on use of vehicles and sound and image data such as CCTV or photographs.

“Processing” means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be “sensitive personal data”.

References in the Privacy Notice to employment, work (and similar expressions) include any arrangement we may have under which an individual provides us with work or services. By way of example, when we mention an “employment contract”, that includes a contract under which you provide us with services; when we refer to ending your employment, that includes terminating a contract for services. We use the word “you” to refer to anyone within the scope of the notice.

Legal grounds for processing personal data

WHAT ARE THE GROUNDS FOR PROCESSING?

11. Under data protection law, there are various grounds on which we can rely when processing your personal data. In some contexts more than one ground applies. We have summarised these grounds as Contract, Legal obligation, Legitimate Interests and Consent and outline what those terms mean in the following table.

<i>Term</i>	<i>Ground for processing</i>	<i>Explanation</i>
Contract	Processing necessary for performance of a contract with you or to take steps at your request to enter a contract	This covers carrying out our contractual duties and exercising our contractual rights.
Legal obligation	Processing necessary to comply with our legal obligations	Ensuring we perform our legal and regulatory obligations. For example, providing a safe place of work and avoiding unlawful discrimination

Legitimate Interests	Processing necessary for our or a third party's legitimate interests	<p>We or a third party have legitimate interests in carrying on, managing and administering our respective businesses effectively and properly and in connection with those interests processing your data.</p> <p>Your data will not be processed on this basis if our or a third party's interests are overridden by your own interests, rights and freedoms.</p>
Consent	You have given specific consent to processing your data	In general processing of your data in connection with employment is not conditional on your consent. But there may be occasions where we do specific things such as provide a reference, or obtain medical reports and rely on your consent to our doing so.

PROCESSING SENSITIVE PERSONAL DATA

12. If we process sensitive personal data about you, as well as ensuring that one of the grounds for processing mentioned above applies, we will make sure that one or more of the grounds for processing sensitive personal data applies. In outline, these include:

- Processing being necessary for the purposes of your or our obligations and rights in relation to employment in so far as it is authorised by law or collective agreement;
- Processing relating to data about you that you have made public (e.g. if you tell colleagues that you are ill);
- Processing being necessary for the purpose of establishing, making or defending legal claims;
- Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of your working capacity;
- Processing for equality and diversity purposes to the extent permitted by law.

Further information on the data we process and our purposes

13. The Core Notice outlines the purposes for which we process your personal data. More specific information on these for recruitment specifically, examples of the data and the grounds on which we process data are in the table below. The examples in the table cannot, of course, be exhaustive. In the case, where you are employed, you will be provided with a separate privacy notice.

<i>Purpose</i>	<i>Examples of personal data that may be processed</i>	<i>Grounds for processing</i>
Recruitment	Information concerning your application and our assessment of it, your references, any checks we may make to verify information provided or background checks and any information connected with your right to work in the UK. If relevant, we may also process information concerning your health, any disability and in connection with any adjustments to working arrangements.	Contract Legal obligation Legitimate interests
Monitoring of diversity and equal opportunities	Information on your nationality, racial and ethnic origin, gender, sexual orientation, religion, disability and age	Legitimate interests

Where the data comes from

14. When you start employment with us, the initial data about you that we process is likely to come from you: for example, contact details and information on your immigration status and whether you can lawfully work. We may also require references and information to carry out background checks.

Who gets to see your data?

INTERNAL USE

15. Your personal data may be disclosed to your managers, HR and administrators for employment, administrative and management purposes as mentioned in this document. We may also disclose this to other members of our group.

EXTERNAL USE

16. We will only disclose your personal data outside the group if disclosure is consistent with a ground for processing on which we rely and doing so is lawful and fair to you.

We may disclose your data if it is necessary for our legitimate interests as a company or the interests of a third party (but we will not do this if these interests are over-riden by your interests and rights in particular to privacy). We may also disclose your personal data if you consent, where we are required to do so by law and in connection with criminal or regulatory investigations.

17. Specific circumstances in which your personal data may be disclosed include:
- Disclosure to company's that process data on our behalf such as background check agencies, our payroll service, insurers and other benefit providers, our bank and company's that host our IT systems and data;
 - Disclosure to external recipients of electronic communications (such as emails) which contain your personal data;
 - Disclosure to external recipient third parties such as regulatory consultants.

Retaining your personal data – more information

18. Although there is no specific period for which we will keep your personal data, we will not keep it for longer than is necessary for our purposes. In general, we will keep your personal data for the duration of your employment and for a period afterwards. In considering how long to keep it, we will take into account its relevance to our business and your employment either as a record or in the event of a legal claim.

Personal data relating to job applicants (other than the person who is successful) will normally be deleted after 12 months.

Transfers of personal data outside the EEA – more information

19. In connection with our business and for employment, administrative, management and legal purposes, we may transfer your personal data outside the EEA to members of our group, including the US. We will ensure that the transfer is lawful and that there are appropriate security arrangements.

The United States does not provides an adequate level of protection in relation to data that is transferred there. Accordingly, we have entered into agreements with our group companies and service providers ensuring appropriate and suitable safeguards in line with the standard contractual terms adopted by the European Commission, unless other lawful safeguards are in place to allow the transfer of your data, for example, the recipient of your data has joined the EU-US Privacy Shield framework. If you wish to see details of these safeguards, please ask the Director.

Access to your personal data and other rights

20. We try to be as open as we reasonably can about personal data that we process. If you would like specific information, just ask us.

You also have a legal right to make a "subject access request". If you exercise this right and we hold personal data about you, we are required to provide you with information on it, including:

- Giving you a description and copy of the personal data
- Telling you why we are processing it

If you make a subject access request and there is any question about who you are, we may require you to provide information from which we can satisfy ourselves as to your identity.

As well as your subject access right, you may have a legal right to have your personal data rectified or erased, to object to its processing or to have its processing restricted. If you have provided us with data about yourself (for example your address or bank details), you have the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the ground for processing is Consent or Contract.

If we have relied on consent as a ground for processing, you may withdraw consent at any time – though if you do so that will not affect the lawfulness of what we have done before you withdraw consent.

Complaints

21. If you have comments, concerns or complaints relating to our processing of your personal data, you should raise these with our contact in the first instance heather@optumventures.com.

You may also raise complaints with the Information Commissioner who is the statutory regulator. For contact and other details ask HR or see: <https://ico.org.uk/ICO>.