

UCB Recruitment Privacy Policy

1. WHO WE ARE AND HOW YOU CAN CONTACT US

“UCB” or “we” means UCB SA, a Belgian company with registered office at 60, Allée de la recherche, 1070 Anderlecht and the (local) UCB entity(ies) to which you submit your application. For more information on the contact details of the UCB affiliate in your jurisdiction, please visit the ‘UCB Worldwide’ overview at <https://www.ucb.com/worldwide> and select your country.

As **controller**, i.e. the legal entity that decides on the why and how information relating to you (“**personal data**”) is processed within the framework of recruitment by UCB, we respect your right to privacy. We will only process your personal data as described in this UCB Recruitment Privacy Policy (the “**Policy**”) and in accordance with the relevant data protection legislation, including *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (General Data Protection Regulation or “**GDPR**”).

At UCB we have a data protection officer (DPO), who can be contacted by any of the following means for any privacy-related questions, including regarding how we collect, store and use your personal data:

- E-mail: dataprivacy@ucb.com ; or
- Regular mail: To the attention of the (global) Data Protection Officer, Allée de la recherche 60, 1070 Anderlecht or to the attention of the local UCB Data Protection Officer at the postal address of the UCB affiliate in your jurisdiction. For more information, please visit <https://www.ucb.com/worldwide> and select your country.

2. THE REASON BEHIND THIS PRIVACY POLICY

The Policy governs the collection, use and retention by UCB of your personal data within the framework of your participation in the UCB recruitment process.

The Policy consists of five main components and informs you about:

1. Who we are and how you can contact us;
2. The reason behind this Policy;
3. The purposes for which we process your personal data, the related legal basis under the GDPR and applicable retention periods;
4. What your rights are in relation to the personal data we hold about you and how you can exercise them; and
5. Further details on how we process (including share and transfer) your personal data.

This Policy may be updated periodically to reflect changes in our personal data processing practices. In that case we will post a prominent notice on the careers web portal available at <https://careers.ucb.com/> (the “**Careers Portal**”) or through our usual communication channels to inform you of any significant changes.

3. PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA AND APPLICABLE LEGAL BASIS

The table below indicates per purpose the categories of personal data we collect and process about you, the source from which we obtained such information, who we share your personal data with, on what legal basis and how long we retain your personal data.

1. In order to make the Careers Portal and its content available to you, UCB:

Collects the following personal data about you:	1. Electronic identification data 2. Information collected through cookies <i>Failure to provide this personal data may result in (some features of) the Careers Portal not being accessible.</i>
Receives this data from:	You (through the device(s) you use to access the Careers Portal)
Retains (**) your personal data for:	2 years. For cookies, See our Cookie Policy)
Shares your personal data with:	UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	- Processing necessary for performance of a contract with you (including regarding the use of necessary cookies) - For other cookies see further below for the applicable legal basis and our Cookie Policy for more information)

2. In order to maintain our Careers Portal security, we deploy cookies and log files to monitor access to and traffic on our Careers Portal in order to detect and prevent malicious activity or invalid traffic. In this context, UCB:

Collects the following personal data about you:	1. Electronic identification data 2. Information collected through cookies <i>Failure to provide this personal data may result in (some features of) the Careers Portal not being accessible.</i>
Receives this data from:	You (through the device(s) you use to access the Careers Portal)
Retains (**) your personal data for:	For a period of 2 years following your last interaction with UCB, see Cookie Policy)
Shares your personal data with:	UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	- Processing necessary for the purpose of the legitimate interests pursued by UCB to protect its IT infrastructure and maintain the security of its business assets. To this end, UCB strives to maintain a fair balance between its need to process your personal data and the preservation of your rights and freedoms, including the protection of your privacy. For more information or if you have any questions regarding how we assess this balance, please contact us through any one of the channels set out under Section 1 above (“ <i>Who we are and how you can contact us</i> ”). - For cookies, processing based on your consent except for necessary cookies (see Cookie Policy for more information).

3. In order to enable:

- a. Monitoring of the Careers Portal (e.g. checking whether it is up and running);
- b. Content monitoring (e.g. checking which features of the Careers Portal are used); and
- c. The support and improvement of the Careers Portal functionality (including making it more intuitive) and to better understand usage patterns;

we use cookies that allow us to evaluate - on an aggregate level - use made of our Careers Portal and how users (including yourself) access different features of our Careers Portal. In that context, UCB:

Collects the following personal data about you:	1. Electronic identification data
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	2. Information collected through cookies <i>Failure to provide this personal data may result in (some features of) the Careers Portal not being accessible.</i>
Receives this data from:	- You (through the device(s) you use to access the Careers Portal); - Our third party service providers (through the use of cookies)
Retains (**) your personal data for:	For a period of 2 years following your last interaction with UCB . For cookies, see Cookie Policy)
Shares your personal data with:	UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	- Processing necessary for the purpose of the legitimate interests pursued by UCB to manage the Careers Portal and verify its proper functioning, manage its recruitment activities and to further improve upon the Careers Portal and recruitment process. To this end, UCB strives to maintain a fair balance between its need to process your personal data and the preservation of your rights and freedoms, including the protection of your privacy. For more information or if you have any questions regarding how we assess this balance, please contact us through any one of the channels set out under Section 1 above (“ <i>Who we are and how you can contact us</i> ”). - For cookies, processing based on your consent except for necessary cookies (see Cookie Policy for more information).

4. In order to enable UCB to comply with its legal obligations, UCB:

Collects the following personal data about you:	1. In relation to pharmacovigilance obligations: patient’s details as well as health data, including information regarding adverse event (seriousness, date and unique identification number)(*) 2. Any other legally required information (*) <i>Failure to provide the personal data with an (*) may prevent UCB from complying with its obligations in accordance with applicable laws</i>
Receives this data from:	- You; - The recruitment agency (to the extent applicable)
Retains (**) your personal data for:	For as long as is legally required
Shares your personal data with:	- Relevant regulatory and government agencies - UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	Compliance with our legal obligations (including but not limited to social security, anti-discrimination, pharmacovigilance and other European or EU Member State laws)

5. In order to enable you to create a log-in and manage your profile (including preferences and consents) on the Careers Portal, UCB:

Collects the following personal data about you:	1. Your contact details(*): your first name, last name, e-mail address, country of residence ; 2. Your professional background: your current job title, your current employer, your interest level; 3. Your Curriculum Vitae: professional background, your current and past job titles & employers, educational background, skills & competencies 4. Your log-in details (*): Log-in and password;
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	<i>Failure to provide the personal data with and (*) will result in a failure to connect on the Careers Portal and as a consequence, you will not be able to apply for job postings via the Careers Portal.</i>
Receives this data from:	<ul style="list-style-type: none"> - You; - The recruitment agency (to the extent applicable)
Retains (**) your personal data for:	For a period of 2 years following your last interaction with UCB. <i>Should your application be successful, your personal data will become part of your employment record at UCB and will be subject to the retention periods mentioned in our Employee Data Protection Notice</i>
Shares your personal data with:	Other UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	Processing necessary for performance of a contract with you

6. In order to manage our recruitment activities, including to respond to your candidacy for a particular job posting and complete any recruitment procedure you initiate through the Careers Portal or via recruitment, UCB:

Collects the following personal data about you:	<ol style="list-style-type: none"> 1. Your contact details(*): your first name, last name, e-mail address, country of residence; 2. Your professional background: your current job title, your current employer, your interest level; 3. Your Curriculum Vitae(*): professional background, your current and past job titles & employers, educational background, skills & competencies 4. Data gathered/produced during the recruitment process (including interview notes, assessments reports by specialized center (if applicable), test results (if applicable) and other documentation produced during the recruitment process). <p><i>Failure to provide the data with and (*) will prevent UCB from adequately responding to your application and may lead to your candidacy being denied.</i></p> <p>If UCB offers you a job, we will also collect:</p> <ol style="list-style-type: none"> 1. Your salary, diploma, national identification or ID number and other information which may be locally required to be able to prepare and extend the offer <p><i>Failure to provide this information means that UCB will not be able to extend a job offer to you.</i></p>
Receives this data from:	<ul style="list-style-type: none"> - You; - The recruitment agency (to the extent applicable)
Retains (**) your personal data for:	For a period of 2 years following your last interaction with UCB. <i>If you are retained as a UCB employee, this information will subsequently become part of your employment record at UCB and will be subject to the retention periods set out in our Employee Data Protection Notice.</i>
Shares your personal data with:	Other UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	Processing necessary for the purpose of the legitimate interests pursued by UCB to manage its recruitment activities (including recruiting new talent). To this end, UCB strives to maintain a fair balance between its need to process your personal data and the preservation of your rights and

freedoms, including the protection of your privacy. For more information or if you have any questions regarding how we assess this balance, please contact us through any one of the channels set out under Section 1 above (“Who we are and how you can contact us”).

If UCB extends a job offer to you, processing necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract.

7. In order to contact you regarding future job opportunities which we think may be of interest to you, UCB:

Collects the following personal data about you:	<ol style="list-style-type: none"> 1. Your contact details (*): your first name, last name, e-mail address, country of residence; 2. Your Curriculum Vitae (*): professional background, your current and past job titles & employers, educational background, skills & competencies <p><i>Failure to provide the personal data with and (*) will prevent UCB from presenting you with interesting job opportunities at UCB.</i></p>
Receives this data from:	You
Retains (**) your personal data for:	For a period of 2 years following your last interaction with UCB
Shares your personal data with:	Other UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	Processing based on your consent

8. In order to contact you to collect your feedback on the recruitment process through surveys so that we may further improve upon our recruitment process, UCB:

Collects the following personal data about you:	<ol style="list-style-type: none"> 1. Your contact details (*): your first name, last name, e-mail address, country of residence; 2. Feedback on the UCB recruitment process, including on interactions with UCB and recruiters and the overall satisfaction of the candidate experience. <p><i>You are not obligated to complete the survey. Any information you do offer is on an entirely voluntary basis.</i></p>
Receives this data from:	You
Retains (**) your personal data for:	For a period of 6 months following your completion of the survey
Shares your personal data with:	Other UCB subsidiaries/ affiliated companies and third party processors (as detailed in Section 5.A)
Relies on the following GDPR legal basis:	Processing based on your consent

*(**) We will retain your personal data in accordance with the retention periods set out in the table above. These retention periods included in our data retention policy are dictated by:*

- Applicable statutory/legal requirements;*
- Industry guidelines, and*

- *For those data categories for which no express statutory or legal requirements apply, certain other determining factors such as the need to prove or enforce a transaction or contract, enforce our policies, etc.*

We will delete your personal data once the abovementioned retention periods will have expired or if you object to or withdraw your consent to our processing of your personal data (to the extent such processing is based on your consent), except where we need to hold on to such data for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, for compliance with a European or European Member State legal obligation which requires such further processing or where we need to prove or enforce a transaction or contract or enforce our polici

4. YOUR RIGHTS AND HOW YOU CAN EXERCISE THEM

4.A. Your rights

Right to access

You have the right to obtain confirmation from us as to whether or not we process personal data concerning you. You have the right (as far as this does not adversely affect the rights and freedoms of others) to obtain a copy of your personal data from us. *For more information, please check section 4.B "How to exercise your rights".*

Right to rectification

You have the right to ask us to rectify without undue delay any inaccurate personal data concerning you. You can also ask us to complete incomplete personal data regarding you by providing us with a supplementary statement containing such additional information. *For more information, please check section 4.B "How to exercise your rights".*

Right to erasure

You have the right to ask us to erase without undue delay personal data concerning you, where one of the following grounds applies:

- Your personal data are no longer necessary in relation to the purposes for which they were processed;
- You have withdrawn your consent - for those processing activities based on your consent – and we have no other legal ground for such processing;
- You object to the processing of your personal data (*for more information on the right to object, see further below*) and there are no overriding legitimate grounds for such processing;
- Your personal data have been unlawfully processed;
- Your personal data must be erased for compliance with a European or European Member State legal obligation to which UCB is subject.

Please note that your right to erasure will not apply to the extent that processing is necessary for:

- exercising the right of freedom of expression and information;
- compliance with a European or European Member State Law to which UCB is subject;
- reasons of public interest in the area of public health in accordance with article 9(2)(h) and (i) GDPR as well as article 9(3) GDPR;
- archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with the relevant provisions of the GDPR;
- the establishment, exercise or defense of legal claims.

For more information, please check section 4.B "How to exercise your rights".

Right to restriction on processing

You have the right to obtain from UCB restriction of processing by UCB of your personal data where one of the following applies:

- You contest - in good faith - the accuracy of personal data regarding you and held by us, in that case the restriction of processing will apply for a period enabling us to verify the accuracy of your personal data;
- The processing is unlawful and you oppose the erasure of your personal data and request restriction of their use instead;
- We no longer need your personal data, but you require them for the establishment, exercise or defense of legal claims;
- You have objected to the processing of your personal data by UCB in accordance with the relevant GDPR provision, in that case the restriction of processing will apply for a period enabling us to verify if our legitimate grounds override yours.

Please note that notwithstanding the above, we are still allowed to continue storing your personal data (throughout the period of restriction) or to process your personal data for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person. If you have requested restriction of processing, we will inform you before the restriction of processing is lifted. *For more information, please check section 4.B "How to exercise your rights".*

Right to data portability

You have the right (insofar this does not adversely affects the rights and freedoms of others) to receive the personal data concerning you, that you have provided to UCB, in a structured, commonly used and machine-readable format and to transmit those data to another controller, without hindrance from UCB, where the processing is:

- based on your consent or on a contract; and
- carried out by automated means

For more information, please check section 4.B "How to exercise your rights".

Right to objection to processing

You have the right to object at any time, on grounds relating to your specific situation, to the processing of your personal data by UCB which is based on UCB's pursuit of its legitimate interests as a controller. In that case UCB will no longer process your personal data, unless:

- UCB demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms; or
- For the establishment, exercise or defense of legal claims.

You have the right to object at any time to the processing of your personal data for direct marketing purposes, which includes profiling to the extent that it is related to such direct marketing *For more information, please check section 4.B "How to exercise your rights".*

Right to withdraw consent

Where the processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. *For more information, please check section 4.B "How to exercise your rights".*

4.B. How to exercise your rights

At any time you can log-in to our career portal on <https://careers.ucb.com/> using your log-in and password. You can update or delete your data and account and apply for any open position. Please refer to the information available on the platform to guide you through the process.

If you wish to exercise any of the rights mentioned above, please contact us as set out under section 1 (“*Who we are and how you contact us*”). Please clearly identify the right(s) you wish to exercise and include your contact details (including a valid e-mail or postal address) so that we can respond to your request. Please note that you may be asked to provide proof of your identity.

When you contact us to exercise any of the rights mentioned above, we will respond to your request within one month following receipt of the request. This period may be extended by two additional months where necessary, but in that case we will inform you of any such extension within one month of receipt of your initial request together with the reasons for the delay.

Right to lodge a complaint with supervisory authority

In accordance with article 77 GDPR you have the right to lodge a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that UCB’s processing of your personal data infringes the GDPR. Please visit the website of the relevant supervisory authority for more information on how to submit such a complaint.

5. MORE DETAILS ON HOW WE PROCESS YOUR PERSONAL DATA

5.A. Who we share your personal data with.

Principle

We will disclose your personal data only as described in this Policy (including any updates to this Policy).

Subsidiaries/affiliated companies and third party processors

UCB transfers or discloses your personal data to its subsidiaries/affiliated companies and to third party service providers processing personal data on UCB’s behalf for the purposes set out above.

Third party service providers include recruitment services providers (including Randstad Sourceright, SAP Successfactors and Gr8 People) & recruitment agencies, IT services and website hosting companies (including Oranges cape, (internet) connectivity providers, provider of data analytics (Google and Qualtrics) and tracking services, service providers that provide technical and administrative support for the Careers Portal and underlying IT systems, as well as third party service providers delivering administrative & system support (including Accenture). These service providers provide their services from locations within the EU and outside of the EU (including the USA & India).

Other third parties include regulatory and government agencies (see further below in this Policy), and potentially, third parties with whom UCB may merge or which may be acquired by UCB (see further below in this Policy).

Compliance with laws and legal proceedings

UCB will disclose your personal data where:

- UCB is required to do so by applicable law, by a governmental body or by a law enforcement agency;
- To establish or exercise our legal rights or defend against legal claims;

- To investigate, prevent or take actions against illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies or as otherwise required by law.

Other

If a third party acquires all (or substantially all) of our business and/or assets, we will disclose your personal data to that third party in connection with the acquisition. However, such disclosure will occur subject to and in accordance with applicable data protection laws.

5.B. International transfers

UCB will transfer your personal data to its affiliates, including our affiliates outside of the EU. In that case UCB relies on [UCB's Binding Corporate Rules](#).

UCB will also transfer your personal data to certain third party service providers both within the European Economic Area or "EEA" and outside of the EEA (USA & India) for the purposes set out above.

The transfer of your personal data to third party service providers (as set out above under section 5B) in countries outside of the EEA that do not ensure an adequate level of (data) protection or when the third party service provider is not Privacy Shield certified (for transfers to the US), occurs on the basis of Standard Contractual Clauses that have been executed between UCB and the relevant third party service provider. You may - by exercising your rights set out below above under section 4.B (How to exercise your rights) - obtain a copy of the relevant safeguard UCB has put in place or ask UCB to redirect you to the place where they have been made available.

5.C. Links to third party sites

The Careers Portal contains links to other websites operated by third parties, including social media plug-ins (Facebook, Twitter, LinkedIn, YouTube). This Policy does not apply to any website, other than the Careers Portal. Third party websites are governed by their own terms and conditions. You should therefore always carefully check the privacy and cookie policies of third party websites before accepting to be redirected to them.