

Inizio Group Limited and each of its subsidiaries
(together, “Inizio” or the “Inizio Group”)

WELCOME TO INIZIO’S RECRUITMENT PRIVACY NOTICE.

Thank you for your interest in Inizio. We understand that privacy is important to you, and we are committed to managing your personal information with care.

Inizio creates a differentiated set of global solutions to support Pharma and Biotech clients across the life cycle of a drug, from development to launch and beyond patent expiry, across all therapeutic areas. Inizio has operations and delivers services in over 50 countries.

DATA CONTROLLER

Inizio’s business is structured under 5 core divisions:

- (i) Advisory (which includes agencies such as Putnam, STEM, Vynamic, Research Partnership);
- (ii) Medical (which includes agencies such as Ashfield, Apothecom, Nucleus Global, MEDISTRAVA);
- (iii) Marketing and Communications (“MarComms”) (represented by Evoke);
- (iv) Engage (which includes agencies such as Ashfield, Propensity4, Nuvera, The Creative Engagement Group); and
- (v) Biotech.

This privacy policy is issued on behalf of the Inizio Group, so when we mention “Inizio” “we,” “us,” or “our” in this privacy policy, we are referring to the relevant company in the Inizio Group responsible for processing your data.

PURPOSE OF THIS PRIVACY NOTICE

We are providing you with this Privacy Notice because you are applying for work with us (whether as an employee, worker or contractor). It tells you how and why your personal data will be used and for how long we will usually retain it.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By submitting your personal information to us through any means, you are accepting the practices described in the Privacy Notice. If you do not understand or do not agree with any of the terms of this Privacy Notice, please contact us before submitting your personal data.

We keep our privacy notice under regular review. This privacy notice is effective from March 2023.

CONTACT DETAILS

Our full details are:

Trading name: **Inizio**
Legal entity: Inizio Group Limited
Name or title of DPO: Group Data Protection Officer (“DPO”)
Email address: privacy@Inizio.health

Postal address: 8th Floor, Holborn Gate, 26 Southampton Buildings, London, WC2A 1AN

Phone number: +44 (0) 20 3861 3999

You have the right to make a complaint at any time to the supervisory authority for data protection issues in the country in which you reside. We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

WHAT INFORMATION DO WE COLLECT?

We will collect a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number;
- Information to confirm your identity (Passport, national identity cards, driving license etc)
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements;
- Whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; and
- Information about your entitlement to work in the country in which the role is located

We may collect this information in a variety of ways. For example, from application forms, our recruitment portals, curriculum vitae (“CV”) or resumes that you provide to us, from your passport or other identity documents, or collected through interviews or other forms of assessment. We may also collect personal data about you from third parties, such as references supplied by former employers. We will only seek information from third parties once a job offer has been made to you and will inform you that we are doing so.

We will securely store your data in a range of different places, including on your application record, in our Human Resources (“HR”) & recruitment management systems.

HOW WE WILL USE INFORMATION ABOUT YOU?

We will use the personal information we collect about you to decide whether to enter into a contract with you for the role that you have applied for, or other similar roles that we believe may be of interest to you. More specifically, we will use your information to:

- Assess your skills, qualifications, and suitability for the role;
- Carry out background checks and verifications, where applicable;
- Communicate with you about the recruitment process;
- Keep records related to our hiring processes;
- Comply with our legal or regulatory requirements;
- To match your details with all of our job vacancies, to decide if we have other positions that might be suitable for you and of interest to you;
- Where you provide your interest as a candidate, to send your personal information to clients in order that the client may consider you for a role that they have placed with us as recruiter on their behalf; and

Having received your CV/resume and covering letter or application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and may carry out further detailed checks (if it is necessary for us to do so because of the nature of the role) before confirming your appointment.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or 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 INFORMATION

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We will collect information about your criminal convictions history only if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory) and:

- We are legally required by a regulatory body to carry out criminal record checks for those carrying out the role; or
- The role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

AUTOMATED DECISION-MAKING

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

DISCLOSURES OF YOUR PERSONAL DATA

Inizio is a global group of companies and we may share your personal information with other members of the Group. The nature of our business, operations and services requires us to transfer your information (from time to time) to our associated offices and/or group companies. We may transfer the information we collect about you to countries other than your home country or other than the country in which the information is originally collected. Your personal information may be accessible by our other international entities. We will take appropriate steps to ensure that your information is protected and handled in accordance with legal requirements and as described in this Privacy Notice.

We may also share your information with selected third parties including:

- Business partners, clients, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to enforce any contract or agreement between us; or to protect the rights, property, or safety of Inizio, our staff, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

DATA TRANSFER

Whenever we do transfer your personal data to another jurisdiction, we will take appropriate steps to protect such, which includes the following:

- (i) Entering into an agreement with the third party which includes clauses that offer adequate protection for your information and these will offer no less protection than are provided by those determined by the EU commission, a template copy of which is available at: https://commission.europa.eu/law/law-topic/data-protection_en; or
- (ii) Otherwise ensuring that information would only be transferred to third parties in jurisdictions that have at least the same data privacy protection for personal data as the jurisdiction from which the personal data originates from. For example, in the case that the personal data originates from the EEA or UK and is transferred to a third country that has been deemed to offer adequate protection by the EU Commission or UK ICO for the processing of your personal data.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

DATA RETENTION

We will retain your personal information for a period of 24 months after we have communicated to you our decision about whether to appoint you. We retain your personal information 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 information in accordance with applicable laws and regulations.

- Let you know about any further opportunities that may arise in the future that we think may be of interest to you based on your personal information and that we may wish to consider you for

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, which include the following:

- Request access to your information by submitting a request to the DPO at Inizio;
- Update or amend your information if it is inaccurate or incomplete;
- Object to certain uses of your personal data, including direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics on grounds relating to your particular situation;
- Request the deletion of your information, or restrict its use, in certain circumstances (for example, subject to lawful exceptions applying, you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected);
- To withdraw any consents you have provided in respect of our use of your information;
- To request a copy of the information you have provided to us, to use for your own purposes (often called your right to data portability); and
- To lodge a complaint with the relevant data protection supervisory authority in your jurisdiction.

PURPOSE OF PROCESSING ACTIVITIES, RIGHT TO OBJECT TO PROCESSING OR WITHDRAW CONSENT

We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis (or bases) for each activity we may undertake for you as follows:

- Processing an application for a job - legitimate interest;
- Searching to identify other roles in our Group or for our clients that may be of interest to you – consent; and
- Placing you in a role –Contract.

You have the right to object to our processing of your data on the grounds of our legitimate interest. If you do so, we will not be able to continue to process your application. You may also withdraw your consent for us to process your data in order to identify other roles in our Group or for clients that may be of interest to you. If you do so, we will not be able to look for other roles for you. To object to us processing your data or to withdraw your consent, please contact our DPO at our office address set out above. to us processing your data or to withdraw your consent, please contact our DPO at our office address set out above.

If you have any questions about these rights, or you would like to exercise any of them, please contact us by submitting a request to privacy@inizio.health.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.