

**ASPEN PHARMACARE HOLDINGS LIMITED
AND ITS SUBSIDIARIES**
(“Aspen”, “the Group” or “Aspen Group of Companies”)

CANDIDATE PRIVACY NOTICE

- [1. INTRODUCTION](#)
- [2. SCOPE](#)
- [3. WHAT PERSONAL DATA WE COLLECT](#)
- [4. HOW WE COLLECT PERSONAL DATA](#)
- [5. PURPOSES AND LEGAL BASIS FOR PROCESSING](#)
- [6. DATA RETENTION](#)
- [7. YOUR RIGHTS](#)
- [8. DATA SHARING AND TRANSFERS](#)
- [9. DATA SECURITY MEASURES](#)
- [10. AUTOMATED DECISION-MAKING AND PROFILING](#)
- [11. IF YOU FAIL TO PROVIDE PERSONAL DATA](#)
- [12. DATA BREACH PROCEDURES](#)
- [13. UPDATES TO THIS NOTICE](#)
- [14. CONTACT US](#)
- [15. COMPLAINTS](#)

1. INTRODUCTION

- 1.1. This HR candidate privacy notice (“notice”) explains how Aspen collects, uses, discloses, stores, and secures your personal data if you are our job applicant or candidate (“you” or “candidates”) during the recruitment and selection process.
- 1.2. We are committed to protecting your personal data under applicable data protection laws. This notice outlines the categories of personal data we collect, the purposes and legal bases for processing, your rights regarding your personal data, and how to contact us with any questions or concerns.

2. SCOPE

This notice applies to all individuals who apply for a position with us, including those who use our recruitment platforms or submit applications through third-party agencies.

3. WHAT PERSONAL DATA WE COLLECT

3.1. Identifying information

We may process information to directly recognise or distinguish you as an individual, including your:

- 3.1.1. Full name;
- 3.1.2. Date of birth;
- 3.1.3. Gender;
- 3.1.4. Nationality;
- 3.1.5. National identifiers (e.g. national identity /passport number).

3.2. Contact information

We may process details that allow us to communicate with you or reach you directly, including your:

- 3.2.1. Telephone numbers;
- 3.2.2. Email addresses.

3.3. Application and recruitment data

We may process details related to your application or prospective professional role or employment with us, including your:

- 3.3.1. Curriculum vitae (CV) or résumé;
- 3.3.2. Cover letters and application forms;
- 3.3.3. Employment history and qualifications;
- 3.3.4. Education and training records;
- 3.3.5. References and interview notes;
- 3.3.6. Responses to screening questions and related declarations of interests;
- 3.3.7. Assessment and test results;
- 3.3.8. Work preferences and abilities.

3.4. Special categories of personal data (sensitive data)

We may process particularly sensitive personal information that requires additional protection due to its nature, including your:

- 3.4.1. Health data (e.g. disabilities requiring accommodations);
- 3.4.2. Racial or ethnic origin (for employment equity compliance);
- 3.4.3. Criminal convictions and offences (where required by law).

We handle sensitive personal data with the utmost discretion and limit access to individuals who require it for legitimate purposes.

4. HOW WE COLLECT PERSONAL DATA

- 4.1. **Directly from you:** Such as information you provide through applications, interviews, assessments, or our recruitment portal.
- 4.2. **Third parties:** Such as through recruitment agencies, background check providers, former employers (for references), and social media platforms.
- 4.3. **Automated technologies:** Such as data collected through cookies and similar technologies when you use our online platforms.

5. PURPOSES AND LEGAL BASIS FOR PROCESSING

5.1. Legal bases

We rely on the following legal bases for processing your personal data:

- 5.1.1. **Consent:** Where required under applicable laws, we obtain your consent, such as when processing certain special categories of personal data.
- 5.1.2. **Performance of a contract:** Where necessary before entering into an employment contract with you, as described below.
- 5.1.3. **Compliance with legal obligations:** Where required to comply with applicable laws and regulations, as described below.
- 5.1.4. **Legitimate interests:** Where necessary for our legitimate interests, balanced against your rights and freedoms, as described below.

5.2. Recruitment and selection

We process your personal data for purposes of recruiting you or otherwise choosing you for employment or other similar relationships, including for:

- 5.2.1. Assessing your skills, qualifications, and suitability for employment;
- 5.2.2. Communicating with you about the recruitment process;
- 5.2.3. Verifying information provided, including references and background checks;
- 5.2.4. Facilitating interviews, assessments, and selection processes.

5.3. Compliance with legal obligations

We process your personal data for purposes of meeting the requirements imposed by applicable laws and regulations, including for:

- 5.3.1. Complying with legal and regulatory requirements;
- 5.3.2. Monitoring equal opportunities and diversity metrics;
- 5.3.3. Conducting criminal record checks, where permitted by law.

5.4. Legitimate interests

We process your personal data for purposes of carrying out activities essential to our operations while balancing the need to protect your rights and interests, including for:

- 5.4.1. Managing and improving our recruitment processes;
- 5.4.2. Protecting our legal rights and interests;
- 5.4.3. Considering you for future job opportunities at Aspen.

6. DATA RETENTION

- 6.1. **Successful candidates:** Your personal data will be transferred to your personnel file and processed under our employee privacy notice.
- 6.2. **Unsuccessful candidates:** We will retain your personal data for a limited period after notification to consider you for future opportunities unless you request deletion.

7. YOUR RIGHTS

- 7.1. You have the following rights regarding your personal data:
 - 7.1.1. **Access:** You may request access to your personal data and receive a copy.
 - 7.1.2. **Rectification:** You may request correction of inaccurate or incomplete personal data.
 - 7.1.3. **Erasure:** You may request deletion of your personal data under certain circumstances.
 - 7.1.4. **Restriction:** You may request suspension of processing under specific conditions.
 - 7.1.5. **Objection:** You may object to processing based on legitimate interests.
 - 7.1.6. **Data portability:** You may request the transfer of your personal data to you or a third party.
 - 7.1.7. **Withdrawal of consent:** You may withdraw consent, which we rely on for processing.
- 7.2. To exercise your rights, please contact us using the details in the '**Contact Us**' section below. We may need to verify your identity to process your request.

8. DATA SHARING AND TRANSFERS

- 8.1. We may share your personal data with:
 - 8.1.1. **Group companies:** Other companies within our group to consider you for current and future job openings.
 - 8.1.2. **Service providers:** Third-party vendors providing recruitment services, such as applicant tracking systems, background check providers, and recruitment agencies.
 - 8.1.3. **Legal and regulatory authorities:** Regulatory bodies and law enforcement agencies as required by law.
- 8.2. We may transfer your personal data to countries outside your home jurisdiction, including countries that may not offer the same level of data protection. In such cases, we implement appropriate safeguards, such as standard contractual clauses, to protect your personal data.

9. DATA SECURITY MEASURES

- 9.1. Our policies require that we maintain technical and organisational measures to protect personal data from unauthorised disclosure or misuse. We endeavour to restrict access

to authorised personnel and/or bind them with confidentiality obligations. We routinely assess our security posture to identify and mitigate potential risks.

- 9.2. For more information, please contact us using the details provided in the “**Contact Us**” section below.

10. AUTOMATED DECISION-MAKING AND PROFILING

- 10.1. We may use automated decision-making processes, including profiling and AI technologies, during the recruitment process for:

10.1.1. **Candidate screening:** Automated systems may screen applications to identify suitable candidates.

10.1.2. **Assessment evaluations:** Using standardised assessments to evaluate skills and aptitudes.

10.1.3. **Candidate matching:** Matching your profile with current and future job openings.

- 10.2. You have the right to:

10.2.1. Request human intervention in automated decisions;

10.2.2. Contest decisions made solely based on automated processing.

11. IF YOU FAIL TO PROVIDE PERSONAL DATA

Providing personal data is voluntary. However, failure to provide certain information may hinder our ability to process your application or consider you for employment.

12. DATA BREACH PROCEDURES

We have established procedures to handle data breaches promptly and effectively. If a data breach affects your personal data, we will notify you and the relevant authorities as required by law.

13. UPDATES TO THIS NOTICE

We may update this notice periodically to reflect changes in our practices or legal requirements. The most updated version of this notice is the one accessible via our website. You may request previous versions of this statement by email or via our website contact form..

14. CONTACT US

If you have any questions about this notice or wish to exercise your rights, please access our contact details [here](#).

15. COMPLAINTS

You may submit a complaint to your local or national data protection authority if you believe we have processed your personal data unlawfully.