

## Talent Acquisition and Recruitment Privacy Notice

Date: 01 September 2020

**Biogen Italia** (“**Biogen**”) uses the SmartRecruiters, Inc. of 225 Bush Street, Suite #300, San Francisco CA 94104, USA (“**SmartRecruiters**”) SaaS platform (the “**platform**”) to manage and administer its talent acquisition, sourcing and recruitment process. This Privacy Notice describes what “personal data” (meaning any information relating to an identified or identifiable natural person) we collect about you in relation to the platform, how we use it and why, as well as your rights in relation to this collection and use.

### **Information we collect and how we use it**

Biogen uses the platform to manage and administer our talent acquisition and recruitment process from start to finish. In particular, we use the platform to: (a) advertise Biogen job vacancies and process any applications in relation to those vacancies; (b) assess the suitability of a job applicant; (c) allow individuals to make job referrals; and (d) keep a record of talented individuals that we would like to contact about job vacancies Biogen may have in the future.

**Job applicants:** The information we may collect about you if you decide to apply for a job at Biogen, includes: your full name; location; contact number; education; employment information; (such as level of experience, CV, etc.); and URL to your LinkedIn account. Once you have submitted a job application, your personal data is shared with Biogen within the platform in order to manage the application process. You can also apply for a job at Biogen by logging into your LinkedIn or Indeed account. If you apply for a job using this method, LinkedIn or Indeed will send limited personal data to the platform and you will be able to view or administer your profile within the platform using those sites’ login details.

We will need to collect additional information about you if your job application progresses further on in the recruitment process. The additional personal data that we collect about you will depend on how far your application progresses, and whether you are made a job offer. Generally speaking, the additional information that we collect about you includes any other information related to the interview or assessment process itself (such as interview notes, etc.) If you are a Biogen employee applying for another job at Biogen, we may also collect and use information that we already have about you in other Biogen systems. This may include information about your current job performance.

We collect your information directly from you to assess your suitability for the job that you have applied for, as well as verify your background. We may use automated decision making as part of our initial assessment of your application, to enable us to manage the large volume of applications we receive for each job that we advertise. This involves comparing the personal data that we have collected about you against the job description and criteria. This helps us to determine if we should progress your application further.

Your entering personal data into the platform is always entirely voluntary, however there are some mandatory fields we will need to be able to accept and/or progress an application. If you do not provide us with this information, we may not be able to accept or progress your application further. We will not consider information about you on your Twitter or Facebook page as part of your application. If you provide URLs to these social media platforms, we will delete them.

**Job referrals:** The platform can be used to make Biogen job referrals to potential applicants. If you have been referred by someone for a Biogen job, the information that we collect about you from them includes: full name; e-mail address; and relationship to the person making the referral. If you have made a job referral

on someone else's behalf, please show them this Privacy Notice and make sure that they have read and understood it before you provide their personal data. The referrer will be able to view the status of your application. For example, they will be able to see if you have made an application for the job for which they have referred you, if your application is being reviewed, if you have been invited for an interview or if you have been hired. Biogen shares no other personal data about you with the referrer. Once you have applied for the job at Biogen, you will be considered a job applicant, and we will collect from you the information described in the section above.

**Job leads/prospects:** We may also collect data about you at industry networking events, recruitment companies or from professional networking sites such as LinkedIn, for example, if we have a vacancy that is hard to fill, or our ideal candidate is currently employed by another company. The information we collect about you may include your name and contact information, as well as your work experience. We only collect this data about you if you have made it available for the purpose of being considered for talent acquisition and recruitment, and we have plans to contact you about a job vacancy that Biogen may have in the future.

### **Our legal basis for processing your personal data**

We generally process personal data on the platform based on Biogen's legitimate interests to manage and administer its talent acquisition and recruitment process. We may also process your information later in the recruitment process in order to enter into an employment contract with you if you are made a job offer, or to comply with our legal obligations (such as our obligations in employment law).

### **How we share your information and international transfers**

Your personal data will be stored in a secure database hosted by SmartRecruiters at its data centres located in the UK, and technical and administrative support will be provided by SmartRecruiters. SmartRecruiters will share your personal data with Biogen. If you successfully complete the job application process, your name and e-mail address may be shared with Biogen's background verification service provider. This company will then provide you with a further privacy notice outlining how your personal data is processed in the verification process. If you require travel or relocation assistance, we will share your data with our travel agent and relocation company service providers. Your personal data may also be shared among Biogen group companies during the recruitment process.

Such transfers may include transfers outside your country to countries which do not implement an adequate level of protection for your personal data under your national or European Union data protection law. In such cases, Biogen takes appropriate steps to ensure your data is adequately protected if transferred to such countries (such as putting in place Standard Contractual Clauses). Upon request, Biogen will provide further information on the recipients of your personal data and data transfer agreements with recipients outside the European Economic Area.

### **How we store your personal data and your rights**

Biogen retains your personal data for no longer than is necessary for the purposes for which it has been collected, and in accordance with any specific retention periods required by law. Generally speaking, we keep your personal data for recruitment purposes for up to one year from the end of the talent acquisition process (or three years if you are applying for a job in Spain). If you are recruited through the platform, your information will be retained for at least the duration of your employment.

You may contact Biogen at any time if you would like to access your personal data or require information about the personal data that we hold about you. You may object to the processing of your personal data for legitimate reasons, request the restriction of the processing of it, or the correction or erasure of it. You may also have the right to data portability and the right to challenge a decision based solely on automated

processing. Please note that some of these rights are limited by data protection law and we have the right to collect, process and store your personal data to perform our legal obligations.

### **Contact Biogen**

Under European data protection law, a "data controller" is the legal entity that is responsible for protecting your personal data and helping you to exercise your data protection rights. The data controller of your personal data is the Biogen legal entity which is recruiting for the relevant position. If, at any time, you have questions or concerns about this Privacy Notice or the processing of your personal data, you can contact Biogen by using the "Contact Us" feature on our website [www.biogen.com](http://www.biogen.com). You may also contact Biogen's Data Protection Officer at [privacy@biogen.com](mailto:privacy@biogen.com). You may, should you feel it necessary, lodge a complaint with your local data protection authority if you feel your privacy rights have been infringed.

### **SmartRecruiters**

SmartRecruiters acts as Biogen's data processor in relation to Biogen's talent acquisition activities through the platform.

SmartRecruiters acts as the data controller of your personal data when you create a SmartProfile, or use the platform to review or apply for other non-Biogen jobs or to receive job suggestions, and then processes your information in accordance with its Candidate Privacy Policy. You can find this, [here](#).