

# Galvani Candidate privacy notice

## United Kingdom

*Last Updated: 01 October 2022*

This Privacy Notice is intended for recruitment candidates.

Thank you for your interest in Galvani. We understand that privacy is important to you. We are committed to treating your personal information with care and integrity.

Our Privacy Notice tells you what personal information we collect and how we collect it. We explain what we use your personal information for during recruitment and pre-employment screening. We also explain how we protect your personal information and keep it safe.

Galvani values your privacy. When we say “Galvani”, “we”, “us” or “our”, this is who we are referring to.

Personal information means any information or piece of information which could identify you either directly (eg your name) or indirectly (eg a unique ID number).

If anything in this Privacy Notice conflicts with local law in your jurisdiction, local law prevails.

### **In this privacy notice, we explain:**

- [What personal information do we collect about you?](#)
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## **What personal information we collect about you?**

As part of our recruitment and pre-employment screening we collect your:

- **Basic information** – your name (including prefix or title), gender, age or date of birth;
- **Contact information** – information you provide to us that allows us to contact you, eg your personal or business email, mailing address, telephone number, and profile on a professional social media platform;
- **Professional information and experience** – information related to your education, work experience, references, and referees;
- **National identifiers** – your national ID/passport, residency and work permit status, social security number, or other taxpayer/government identification number;
- **Financial information** – your salary, retirement account information, company allowances, bonus, benefits, working time records, and taxpayer reference number (eg Tax Identification Number, National Insurance number, Social Security Number). We will also collect your bank details if we reimburse you for expenses during the recruitment process;
- **Dependents' information** – information related to your dependents, eg the first and last names, dates of birth, and contact details of your spouse/partner and dependents;
- **Information collected during interviews** – comments noted by our interviewers and audio/video recordings of the interview (in case of telephone interviews or video-enabled interviews);
- **Background information** – education and academic as well as professional qualifications. If we want to offer you the job, we may need to complete pre-employment screening. We may then also collect additional background information such as credit history, criminal records and occupational health information (if permitted by law);
- **Special categories of personal data** – information related to your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, veteran status or information about your health, disabilities, or sexual orientation. We use this information to make sure we meet relevant laws. If we offer you employment, we may also ask you for information about your health (physical or mental) so we can give health and insurance benefits to you and your dependents. We will also use this information to discuss with you what reasonable adjustments we can make for you. We want to make sure we provide an inclusive workplace.

You can decide whether to give us special categories of information, if we ask you for them. If you decide not to share these with us, please be assured this does not affect your application.

You can also choose not to give us the other types of personal information when we ask you for them. If you decide not to give us your personal information, we may not be able to assess or consider your application.

If you give us the personal information of another person, eg your spouse/partner or referees, we assume you have their permission to share their data with us.

We will not process personal information (including any of the information listed above) if the law of your country prohibits us to do so.

## How do we collect your personal information?

### Directly from you when you:

- Create an account and profile in our careers portal;
- Share or use your social media profile to access our careers portal;
- Sign up with us to receive open job postings;
- Share your resumé with us, either via our careers portal or through other means; and
- Take part in meetings, interviews or recruitment exercises.

### From other sources:

- Recruitment agencies;
- Companies who do pre-employment screening for us; and
- Your colleagues and/or managers when they give us your reference.

### From public sources:

- We collect your personal information from public sources, if allowed by law. We may use such a source to verify your licenses, or to complete any checks we need to do in order to meet relevant laws.

## How do we use your personal information?

We will only use your personal information for the purposes we have described below in this Privacy Notice, or for purposes which are reasonably compatible to the ones described. We cannot, and will not, use it for other purposes without your permission, unless we have a legal right or obligation to do so.

### To consider your application.

We will use your personal information:

- To reply to your application. If someone else referred you to us or we obtained your information from other sources, we will use your personal information to contact you and let you know about our recruitment process;
- To create a profile of you;
- To assess how suitable your profile is for the job you are applying for;
- When we evaluate all our candidates and create a shortlist; and
- To conduct interviews and exercises during the recruitment process.

### For pre-employment screening, if we decide to offer you employment.

We will use your personal information to:

- Check your background, references and other information you gave us, to the extent allowed by law. We share your personal information with companies who do these pre-employment screening checks for us; and
- Prepare an offer of employment and other documents we use at this pre-contract stage of our recruitment process.

### **To include you in our talent pool.**

We will use your personal information to:

- Consider you for opportunities we have now, or future ones, in any of our group companies and affiliates. This means we will share your information with other entities in our corporate group; and
- To let you know about opportunities or to ask you to update your profile.

### **To manage and improve our recruitment processes as well as our business operations related to the recruitment process.**

We will use your personal information to:

- Manage our network and information systems security;
- Keep records related to our hiring processes;
- Measure the recruitment process against our aspirations to ensure we are adhering to fair employment practices;
- Prepare and perform management reporting and analysis, including analytics and metrics, related to the recruitment process.

### **To achieve other purposes.**

We will use your personal information:

- To follow applicable laws and regulations;
- To respond to requests from competent public authorities;
- To tell you about changes to our terms, conditions and policies;
- To exercise or defend Galvani against potential, threatened or actual litigation;
- To protect Galvani, your vital interests, or those of another person;
- To provide work related accommodations or health and insurance benefits to you and to your dependents;
- To evaluate our progress in achieving its diversity hiring goals to ensure equal opportunity monitoring and reporting.
- To respond to and handle your queries or requests; and
- When we sell, assign or transfer all or part of our business;

## **Why are we allowed to collect and use your personal information?**

We can collect and use your personal information when one of the following applies:

- To take steps before entering an employment contract or perform an employment contract;
- To follow the law, for example, employment, social security and occupational health laws and regulations;
- You have specifically given us your permission when such permission is obligatory (the law calls it “consent”). You can withdraw your permission at any time;

- It is in our interest in considering you as a candidate for current and future employment opportunities (the law calls it “legitimate interest”). This does not apply if our legitimate interest is overridden by your interests or fundamental rights and freedoms; and
- To protect your vital interests or those of others.

## How do we protect your personal information?

We want to make sure your personal information is not shared with or used by those not allowed to see it. We use a variety of security measures and technologies to help protect your personal information.

We carefully choose service providers to work with, and check they have security measures and technologies in place to protect your personal information. We do not allow our service providers and suppliers to use your personal information for their own purposes

## What are your rights regarding your personal information?

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal information and the local law in your jurisdiction. Depending on this you may have the right to:

- Ask us for copies of your personal information. There are some exceptions, which means you may not always receive all the information we process;
- Ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Ask us to delete your personal information;
- Ask us to restrict the processing of your information;
- Object to our processing of your personal information;
- Ask that we transfer information you have given us from one organisation to another, or to give it to you; and
- Complain to your local data protection authority.

You can find out how to get in touch with us to ask us to do any of the above by looking at the [‘Contact Information and Privacy point of contact’](#) section.

For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do.

If you object to us using your personal information or withdraw permission for us to use your personal information, after initially giving it to us, we will respect your choice in line with applicable law. However, by objecting or withdrawing your permission, we may not be able to complete the recruitment and pre-employment screening activities described in the [‘How do we use your personal information’](#).

## How long do we keep your personal information?

We will keep your personal information only for as long as we have to so we can complete the recruitment and pre-employment screening activities we have

explained in this Privacy Notice. Once recruitment and pre-employment screening activities are complete, we may need to keep it longer because of a legal action, or an investigation involving Galvani.

In some jurisdictions, laws and regulations tell us how long we must keep your personal information. How long depends on the laws of the jurisdiction you are in when you share the information with us.

If we offer you work, and you decide to accept, we will send our Employee Privacy Notice to you. The Employee Privacy Notice explains how we use, store and protect the personal information of our employees.

## **With whom do we share your personal information?**

We share your personal information on a need to know basis, and to the extent necessary to follow laws and regulations, and to manage and run the activities related to the recruitment process.

We share your personal information only with teams in our group companies and affiliates who need to see it to do their jobs. Galvani is a part of the GSK Group of companies.

In some cases, our recruitment and pre-employment screening activities are done for us by specialised service providers. We will share your personal information with their people and teams who need to see it as part of their job.

We will also share your personal information with other specialised service providers who work with us, for example:

- Event and travel agencies;
- Technology suppliers who work with us to develop and improve our digital forums and apps; and
- Professional advisors, such as auditors, accountants and lawyers.

We will also share your personal information with local or foreign regulators, or government and law enforcement authorities if we need to do so by law. These may be in or outside your country of residence.

## **In what instances do we transfer your personal information outside of your home country?**

We work all over the world. Therefore, we may need to transfer and use your personal information outside of the country where we collect it from you. We implement appropriate measures to protect your personal information when we transfer your personal information outside of your home country such as data transfer agreements that incorporate standard data protection clauses. The data privacy laws in the countries we transfer it to may not be the same as the laws in your home country. Law enforcement agencies, regulatory agencies, security authorities or courts in the countries we transfer your personal information to may have the right to see your personal information.

## **Additional information if you are based in the European Economic Area (EEA)**

The European Commission recognises that some countries outside the EEA have similar data protection standards. The full list of these countries is available [here](#).

If we transfer your personal information to a country not on this list, we do so based on our [Binding Corporate Rules](#) (BCRs) and [standard contract clauses](#) adopted by the European Commission. These enable us to make international transfers of personal information within our group of companies and meet the data protection laws of the European Union and the General Data Protection Regulation (GDPR). Galvani is a part of the GSK Group of companies.

## **How do we use personal information of minors?**

We use the personal information of minors only if the job is meant for an apprentice.

If you live in one of the countries of the European Economic Area (EEA) and you apply for an apprentice job, you are telling us that you are at least 16 years old and that you can give us your personal information and take part in the recruitment process without your parents' consent.

If you live in one of the countries outside of the EEA and you apply for an apprentice job when you are under age according to the laws of your country, we must have the permission of your parents or legal guardians to collect and use your personal information, as described in this Privacy Notice.

## **How do we update this Privacy Notice?**

From time to time, we will update this Privacy Notice. Any changes become effective when we post the revised Privacy Notice on our Privacy centre. This Privacy Notice was last updated as of the "[Last Updated](#)" date shown above. If changes are significant, we will provide a more prominent notice to let you know what the changes are.

## **Our responsibility regarding websites that we do not own or control**

Our careers portal may contain links to websites or mobile applications we do not own or control. Our Privacy Notice does not cover them. Please read the privacy notices on those websites and mobile applications if you would like to find out how they collect, use and share your personal information.

## **Who is the controller of your personal information?**

Galvani Bioelectronics Limited, GlaxoSmithKline LLC, GSK Services Unlimited, together with the local company to which you are applying, are the controllers of your personal information.

Here is a list of the locations where we operate, along with relevant contact details: [worldwide contacts](#)

## Contact Information and Privacy point of contact

If you want to exercise your rights, have any questions about this Privacy Notice, need more information or would like to raise a concern, please contact us at [gsk.recruitment@gsk.com](mailto:gsk.recruitment@gsk.com), with a copy to [privacy@galvani.bio](mailto:privacy@galvani.bio). Please do not use this email for general questions about recruitment or to send speculative applications.

If you would like to find out who your privacy point of contact in your country is, please click here: [Privacy contact information](#) or contact us using the information available here: [worldwide contacts](#).