

## **Catalent's Recruitment Privacy Notice v.2 (updated August 2021)**

### **Introduction**

As part of any recruitment process, Catalent Pharma Solutions, Inc. and its domestic and international affiliates and subsidiaries, including Catalent, Inc. (collectively, "Catalent", "we" or "us") collects and processes personal data relating to candidates. Catalent is committed to being transparent about how it collects and uses that personal data and to meeting its data protection obligations under applicable data privacy laws and regulations, including the General Data Protection Regulation (GDPR) and Brazil's Lei Geral de Proteção de Dados Pessoais, (LGPD)

The purpose of this privacy notice is to make candidates aware of how and why we collect and use your personal data in connection with our recruitment efforts and the development of our talent community.

### **What information do we collect?**

Generally, the personal data we collect from you helps us in our recruitment efforts, manage our talent community and hiring process, conduct Catalent's business, and comply with Catalent's legal obligations.

Catalent will collect the following personal data during the recruitment process:

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience and employment history;
- Information about your current level of remuneration, including benefit entitlements; and
- Any other information that you may choose to disclose to Catalent.

Additionally, Catalent may collect the following personal data in order to remain compliant with applicable labor or employment law:

- Whether or not you have a disability for which Catalent needs to make reasonable adjustments during the recruitment process; and
- Information about your entitlement to work in the relevant country.

Catalent may collect this personal data in a variety of ways. For example, Catalent will collect personal data provided by you in application forms, CVs or resumes, obtained from your passport or other identity documents, collected from third parties such as recruitment agencies, or collected through interviews or other forms of assessment.

Catalent may also collect personal data from publicly available sources such as LinkedIn or your current employer's website. You may choose to provide Catalent with access to certain personal information stored by third parties (for example, LinkedIn). By authorizing Catalent to have access to this information, you agree that we may collect, store, and use this information in accordance with this privacy notice.

We may also collect personal data about you in the form of references supplied by former employers. We will seek information from former employers only once a job offer to you has been made and will inform you that we are doing so.

Data may be stored in different places, including on your application record in our HR management system Workday, other Catalent approved systems/services, and on other IT systems (including email).

### **Why does Catalent process personal data?**

Collecting and using your personal data enables Catalent to administer the recruitment process, including communicating with you about Catalent opportunities and events, setting up an electronic job applicant HR file; managing your application; conducting assessments; organizing interviews, including arranging or reimbursing for your travel; providing accommodations; processing interview feedback; on-boarding; and conducting background checks and screening. We will process your personal data to meet recordkeeping and internal and external reporting responsibilities. If necessary, your data will also be used in investigations and

legal proceedings. We may also need to process your personal data to enter into a contract with you.

In some cases, we need to process personal data to ensure that we are complying with our legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the country before employment starts.

Catalent has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing a candidate's personal data allows us to manage the recruitment process, assess and confirm a candidate's suitability for a position, and decide to whom to offer a job.

Catalent also processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability or, where legally permitted and consistent with Catalent policies, to carry out health and safety protocol processes at our site. This is to carry out its obligations and exercise specific rights in relation to employment. Where Catalent processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, it is pursuant to a legal requirement and for equal opportunities monitoring purposes only.

For some roles, Catalent may be obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our legal obligations and exercise specific rights in relation to employment.

Catalent seeks to develop a robust and diverse talent community of individuals interested in the possibility of joining Catalent. Most candidates consent to join Catalent's talent community so that Catalent can contact them about other interesting job opportunities at Catalent. To make this possible, Catalent asks you whether you want Catalent to keep the personal data that you provide to us so that we may contact you about future opportunities and to provide you with information about Catalent that we think may interest you. You can revoke your consent at any time by emailing [privacy@catalent.com](mailto:privacy@catalent.com).

#### **Does Catalent Use artificial intelligence or profiling in processing your personal data?**

Subject to your express consent (which you voluntarily provide if you join Catalent's talent community or when checking the appropriate consent box during the application process), we conduct 'profiling' to evaluate your suitability for particular job opportunities. This involves using a matching algorithm that is able to evaluate your employment profile and predict your eligibility for a particular job opportunity. We carry out this automated processing for the purposes of: (i) helping recruiters match candidates' profiles to job opportunities by suggesting candidates for consideration for a specific job opportunity; and (ii) sending personalized job recommendations to you based on your profile and/or preferences or other information that may be of interest for you such as Catalent news, webinars and events.

Please note that based on this profiling, you may not be considered for certain job opportunities unless you have applied for them directly.

We do not make hiring decisions based solely on automated decision-making processes and/or profiling. Your personal information will be subjected to human-made decisions as the ultimate hiring decision will be made by the recruiters or hiring manager

#### **Who has access to data?**

Your personal data will be shared internally for the purposes of the recruitment process. This includes members of the HR department, interviewers involved in the recruitment process, managers in the department with a vacancy and IT contractors if access to the personal data is necessary for the performance of the recruitment process.

In addition, we use third parties for recruitment-support services (*e.g.*, Workday, Phenom, etc.). In providing such services, these third parties process your personal data on Catalent's behalf. For any third party that we use, we will ensure that they provide sufficient guarantees regarding the protection of your personal data.

**How does Catalent protect data?**

Catalent takes the security of your personal data seriously. It has technical and organizational measures in place to ensure that your personal data is not lost, accidentally destroyed, misused or inadvertently disclosed.

**For how long does Catalent keep your personal data?**

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. It may also be retained following your employment in accordance with our Records Retention Policy. If your application for employment is unsuccessful and you have not provided your consent for Catalent to maintain your personal data for recruitment purposes, Catalent will hold your personal data on file for six months after the end of the relevant recruitment process. If your application for employment is unsuccessful and you have provided your consent for Catalent to maintain your personal data for recruitment purposes, Catalent will keep your personal data for up to two years for the purposes as set out above.

**What rights do you have regarding your personal data?**

Depending on where in the world you reside, you may have certain rights regarding your personal data. These rights may include the right to access, correct, or delete the personal data that Catalent possesses. When Catalent processes your personal data based on consent, that consent may be withdrawn at any time. To exercise any rights that you may possess or revoke your consent, please contact Catalent at [privacy@catalent.com](mailto:privacy@catalent.com).

The following is a summary of certain rights that may be available to you:

The right to be informed about how we process your personal data;  
The right to access copies of your personal data that we process or control, together with information regarding the nature, Processing, and disclosure of that personal data;  
The right to request rectification of any inaccuracy in your personal data that we process or control;  
The right to request, on legitimate grounds:  
Erasure of your personal data that we process or control (“the right to be forgotten”); or  
Restriction of Processing of your personal data that we process or control;  
The right to object to the scope of personal data processed about you if such processing is (i) not compliance with this notice, or (ii) against the law;  
The right to data portability. This means you have a right to have your personal data provided to you in an accessible format that allows it to be transferred to and used by another controller;  
Where we process your personal data on the basis of your consent, you have the right to withdraw that consent. Such withdrawal will not, however, make any processing we carried out while we had your consent unlawful;  
The right to lodge complaints with your national Data Protection Authority regarding the processing of your personal data by us.

If you have any comments or questions about this notice or about the processing of your personal data as described herein, please contact us at [privacy@catalent.com](mailto:privacy@catalent.com).

Also, if you would like to learn more, please review Catalent’s [Privacy Policy](#).

**What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide us with your personal data during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.