

RECRUITMENT PRIVACY NOTICE - HUMAN RESOURCES

31. 03. 2020

(A) This Notice

Summary – This Notice

We take the protection of your Personal Data very seriously! This Notice explains how we may Process your Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

This Notice is issued by Zentiva on behalf of itself, its subsidiaries and its affiliates (together, “Zentiva”, “Affiliate”, “we”, “us” and “our”), and is addressed to prospective employees (such persons are referred to as the “Staff” or “you”). Defined terms which are used herein are explained in section (T) below.

For the purposes of this Notice, Zentiva is the Controller. Contact details are provided in Section (S) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes that we might make in accordance with the terms of this Notice.

In relation to you, Zentiva is the controller of personal data, therefore it independently determines the purposes and means of processing personal data below and determines measures related to the processing of personal data, in particular its security. As a personal data controller, Zentiva is responsible for ensuring that personal data is processed in accordance with the requirements of applicable law (especially GDPR). When processing personal data by any of the Zentiva, there is no decision-making on data subjects based solely on automatic processing of personal data (including profiling) that has legal effects or has a significant impact on the data subject.

(B) Collection of Personal Data Generally

Summary – Collection of Personal Data Generally

Personal information we may collect or obtain directly from you (for example, if you provide us with your CV) without a specific position.

Collection of Personal Data:

- Personal data is collected directly from you.
- We may collect your personal information for the purpose of finding a suitable job position for you during the retention period or until your recall.

(C) Collection of personal data for a specific job

Summary – Collection of personal data for a specific job

Personal information we may collect or obtain directly from you (for example, if you provide us with your CV) solely for the purpose of recruiting for specific positions.

Collection of Personal Data:

- Personal data is collected directly from you.
- We may collect your personal information for the purpose of recruiting this specific job for the duration of this selection process or longer, if your consent is given.



(D) Categories of Personal Data That We May Process

Summary – Categories of Personal Data That We May Process

For example, we may process: your personal information (eg your name); Demographics (e.g., your age) Your contact information (eg your address); Your CV; Your employer information (if applicable) any opinions or opinions you give us.

Zentiva can process the following categories of personal data:

- name and surname; academic title; date and place of birth; marital status; the job title; nationality; educational attainment and date of graduation; indication of previous employers and jobs; a statement of disability; driving license (if exists); work and residence permit number (if applicable); information on work capacity, eventually reduced work capacity;

(E) Legal Basis for Processing Personal Data

Summary – Legal Basis for Processing Personal Data

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; or where we have a valid, legitimate interest in the Processing.

When Processing your Personal Data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your Personal Data where we have obtained your prior, explicit consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- Contractual Necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may enter into with us, eg work performance agreements;
- Legal compliance: processing is required to comply with Zentiva legal obligations under applicable law;
- Legitimate interest: processing is necessary for the purposes of Zentiva legitimate interests over which the interests of data subjects or their fundamental rights or freedoms do not take precedence; these legitimate interests of Zentiva are, in particular, maintaining the safety and security of Zentiva employees and activities; and the protection of Zentiva premises and property; and quality service delivery and performance of Zentiva.

(F) Sensitive Personal Data

Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data. Where we need to Process your Sensitive Personal Data, such as your medical records or information about adverse effects of medication on your health, we Process it only for a legitimate purpose, and we do so in accordance with applicable law.

We do not seek to collect or otherwise Process Sensitive Personal. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with Applicable Law: processing is required or permitted by applicable law or applications applicable labour legislation within the European Union;



- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, explicit consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

If you provide Sensitive Personal Data of any other data subject to us, you must ensure that it is lawful for you to disclose such data to us, including ensuring that one of the legal bases set out above is available to us with respect to the Processing of those Sensitive Personal Data.

(G) Purposes for Which We May Process Your Personal Data

Summary – Purposes For Which We May Process your Personal Data

We may only process your Personal Data for specific purposes.

We may Process your Personal Data for the following purposes:

- Human resources management: human resources management and recruitment;
- Health and safety: protection of health and safety when visiting the recruitment process.

(H) Disclosure of Personal Data to Third Parties

Summary – Disclosure of Personal Data to Third Parties

We may disclose your Personal Data to: legal and regulatory authorities; our external data Processor and subcontractors of our Processor; our external advisors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business.

We may disclose your Personal Data to other Affiliates within the Zentiva, for legitimate business purposes (including operating our Sites, and providing products and services to you), in accordance with applicable law. A full list of Zentiva Affiliates that may have access to the Personal Data is available in Section (S) below.

In addition, we may disclose your Personal Data to:

- you and, where appropriate, your appointed representatives;
- legal and regulatory authorities, when obliged to do so by law or by command of a relevant authority, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- auditors, lawyers and other outside professional advisors to Zentiva, subject to binding contractual obligations of confidentiality;
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of preventing, investigating, detecting or prosecuting criminal offences or executing criminal penalties;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of reorganization, dissolution or liquidation).

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to:

- (i) only Process the Personal Data in accordance with our prior written instructions;
- (ii) take measures to protect the confidentiality and security of the Personal Data, together with any additional requirements under applicable law.



(I) Profiling

Summary – Profiling

The processing of your Personal Data does not involve automated decision making, including Profiling.

(J) International Transfer of Personal Data

Summary – International Transfer of Personal Data

We may transfer your Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA to a recipient outside the EEA that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we may need to transfer your Personal Data within the Zentiva, and to third parties as noted in Section (H), in connection with the purposes set out in this Notice. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (U) below.

Please note that when you transfer any Personal Data directly to the Zentiva established outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive such data, in accordance with the provisions of this Notice.

(K) Data Security

Summary – Data Security

We implement appropriate technical and organizational security measures to protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the Internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the Internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us is sent securely.

(L) Data Accuracy

Summary – Data Accuracy

We take every reasonable step to ensure that your Personal Data is kept accurate and up-to-date and is erased or rectified if we become aware of inaccuracies. Please let us know if your Personal Data that we keep is inaccurate or not up-to-date.

We take every reasonable step to ensure that:



- your Personal Data that we Process is accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that is inaccurate (having regard to the purposes for which it is Processed) is erased or rectified without delay.

From time to time, we may ask you to confirm the accuracy of your Personal Data. You can always contact us with a request to rectify or erase inaccurate Personal Data. For more details, please see the section about your legal rights.

(M) Data Minimization

Summary – Data Minimization

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process is limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

(N) Data Retention

Summary – Data Retention

We take every reasonable step to ensure that your Personal Data is only retained for as long as it is needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data is only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- (1) We will retain copies of your Personal Data in a form that permits identification only for as long as:
 - (a) we maintain an ongoing relationship with you (e.g. we have a long-term, ongoing relationship); or
 - (b) we are obliged by law to keep your Personal Data; or
 - (c) your Personal Data is necessary in connection with the lawful purposes set out in this Notice (e.g. in relation to the occupational safety and accidents agenda),

plus:

- (2) the duration of:
 - (a) any applicable limitation period (i.e. any period during which any person could bring a legal claim against us in connection with your Personal Data, or any authority can initiate legal proceedings in which your Personal Data may be relevant); and
 - (b) an additional two (2)-month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that is relevant to that claim, or if any authority initiates proceedings, we will still possess relevant documentation),

and:

- (3) in addition, if any relevant legal claims are brought or any other legal procedure is initiated, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim or such proceedings.



During the periods noted in paragraphs (a) and (b) above, we will restrict our Processing of your Personal Data to the storage of, and maintaining the security of, such data, except to the extent that such data needs to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data; or
- anonymize the relevant Personal Data.

(O) Your Legal Rights

Summary – Your Legal Rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have a number of rights regarding the Processing of your Relevant Personal Data, including:

- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of such Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
 - erasure of your Relevant Personal Data; or
 - restriction of Processing of your Relevant Personal Data;
- the right to object, on legitimate grounds, to the Processing of your Relevant Personal Data by us or on our behalf, especially in case of direct marketing;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (S) below. Please note that:

- we may require proof of your identity before we can give effect to these rights;
- where your request requires the establishment of additional facts (e.g. a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take; and



- where our processing is based on our legal duties, we might not be able to accommodate your request.

(P) Cookies and Similar Technologies

Summary – Cookies and Similar Technologies

We may Process your Personal Data by placing or reading Cookies and similar technologies.

When you visit a Site, we may place Cookies (a small data file) onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with the law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. This might include our analysis of the ways visitors engage with our sites in order to improve your experience, to provide you with more relevant content and offer you more relevant goods.

We may Process your Personal Data through Cookies and similar technologies.

(Q) Terms of Use

Summary – Terms of Use

All use of our websites, our products, or our services is subject to our internet <https://www.zentiva.com/gdpr> web-based documents.

All use of our websites, our products, or our services is subject to our internet <https://www.zentiva.com/gdpr> web-based documents. We recommend that you review our Terms of Use regularly, in order to review any changes that we might make from time to time.

(R) Direct Marketing

Summary – Direct Marketing

We may Process your Personal Data to contact you with information regarding products or services that may be of interest to you and for which you gave us permission. You may unsubscribe for free at any time.

You can unsubscribe from our email address list at any time by contacting your Privacy Officer - see section (S) for a list of communication channels.

(S) Contact Details

Summary – Contact Details

You may contact us by phone, email or post – see (U) for a list of local legal and correspondence addresses.

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Michal Merta, MBA, MSc., LL.M (Data Protection Officer)

dpo@zentiva.com

☎: +420 234 363 666

(T) Definitions



- **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.
- **“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies, such as web beacons and clear GIFs.
- **“Controller”** means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“EEA”** means the European Economic Area.
- **“Health Care Professional”** means person who works in the health care sector, medicine sector or related industries. It can be, e.g. a doctor, an employee of a hospital, a pharmacist.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Profiling”** means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular, to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.



- “**Site**” means any website operated, or maintained, by us or on our behalf.
- “**Affiliate**” shall mean any person that at such time is Controlled by or is under common Control of AI Sirona (Luxembourg) Acquisition S.a.r.l, Company No. B223382, with its seat at 2-4 rue Beck L-1222 Luxembourg, Grand Duchy of Luxembourg see (U). It being understood that, for the purposes of this document, the term “Control” (and its grammatical variations) shall mean (i) possession, direct or indirect, through one or more intermediaries, of the power to direct the management or policies of a person, whether through ownership of voting securities, by contract relating to voting rights or otherwise, or (ii) ownership, direct or indirect, through one or more intermediaries, of more than fifty percent (50%) – or any other percentage as per any applicable law which enables to exercise the Control – of the outstanding voting securities or other ownership interest of such person.

(U) List of the joint data controllers

Summary - List of the joint data controllers

List of Zentiva (correspondence and legal addresses) and joint controllers are located on public place of internet <https://www.zentiva.com/gdpr/privacy-notice> section (U).

