

Recruitment Privacy Policy

1. Who We Are

Novellas Healthcare NV is committed to protecting your personal data and respecting your privacy.

This Recruitment Privacy Policy explains how we collect, use, store and share your personal data during recruitment and staffing activities, including how we use your consent to retain your profile for future opportunities.

For the purposes of data protection legislation, including the General Data Protection Regulation (EU) 2016/679 ("GDPR"), Novellas Healthcare NV is the Data Controller of your personal data.

Contact Details

Novellas Healthcare NV

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E-mail : info@novellashealthcare.com

Phone : +32 2 456 00 00

Data Protection Officer

Anke Verheyen

anke.verheyen@novellashealthcare.com

2. What Personal Data We Collect

We may collect and process the following categories of personal data:

Information you provide directly

- Name
- Contact details (email address, telephone number, postal address)
- Curriculum Vitae (CV) or résumé
- Employment history
- Educational background
- Qualifications and certifications
- Skills and competencies
- Salary expectations
- Availability and work preferences
- References provided by you

Information collected from other sources

We may obtain personal data from:

- Professional networking websites (such as LinkedIn)
- Job boards
- Recruitment platforms
- Referrals
- Publicly available professional sources
- Previous interactions with our organization

Recruitment Process Information

- Interview notes
- Candidate assessments
- Communications between you and our recruiters
- Information regarding applications and placements
- Feedback from clients or interviewers, where relevant and appropriate

Candidates should not include patient data, health data or confidential third-party data in CVs or communications.

Candidate data is stored in recruitment and CRM systems, including Salesforce.

3. Special Categories of Personal Data

Novellas does not request special category data during recruitment unless necessary and permitted by law. Candidates should not include health, disability, racial or ethnic origin, political opinions, religious beliefs, union membership, genetic/biometric data, or other sensitive information in CVs unless specifically requested and relevant.

4. Purposes and Legal Basis for Processing

We process your personal data for the following purposes:

➤ **Recruitment and Placement Activities**

- Assessing your suitability for employment opportunities
- Matching your profile with client vacancies
- Contacting you regarding relevant positions
- Managing recruitment processes

Legal Basis: Legitimate Interests

Our legitimate interest is to identify and contact suitable candidates, assess applications and manage specific recruitment and placement processes. Where processing is necessary to take steps at your request before entering into a contract directly with you, Article 6(1)(b) GDPR may also apply. You do not need to consent to future talent-pool retention to be considered for a specific role.

➤ **Candidate Database and Talent Pool**

If you separately agree, we will retain and use your relevant professional profile, CV, contact details and recruitment information in our Salesforce candidate database to consider you for future healthcare, life sciences, clinical research, staffing and patient support opportunities. This is optional: refusing consent will not affect your consideration for a specific vacancy. You may withdraw consent at any time by contacting our DPO. Withdrawal will not affect processing already carried out lawfully, and we will stop future talent-pool processing unless another specific lawful ground requires limited retention.

Legal Basis: Consent (Article 6(1)(a) GDPR) for optional candidate-pool retention and future matching.

➤ **Compliance with Legal Obligations**

We may process your data to comply with applicable legal and regulatory requirements.

Legal Basis: Compliance with a Legal Obligation

➤ **Establishment, Exercise or Defence of Legal Claims**

Where necessary, we may retain and process personal data to establish, exercise or defend legal claims.

Legal Basis: Legitimate Interests and/or Compliance with Legal Obligations

Where we rely on legitimate interests (including sourcing, managing individual applications and limited legal-claim records), we assess necessity and the balance with candidates' rights. Where we rely on consent for the talent pool, we process data only for the purposes covered by the consent and maintain evidence of the candidate's choice.

5. Who We Share Your Personal Data With

We may share your personal data with:

- Prospective employers and clients seeking candidates
- Group companies (where applicable)
- Recruitment technology providers
- External recruiters, freelance recruiters and recruitment subcontractors supporting our recruitment activities
- Applicant tracking and CRM providers
- IT service providers
- Professional advisers
- Regulatory authorities where legally required

We may provide relevant candidate information to external recruiters or subcontractors who assist us with recruitment activities. They are required to handle this information confidentially and in accordance with applicable data protection agreements.

Where we consider you suitable for a specific staffing or recruitment opportunity, we may share relevant parts of your candidate profile with the client or prospective employer involved in that opportunity. Candidate data may include CVs, candidate profiles, shortlists and structured comparison overviews, limited to information relevant to the assessment of the candidate's suitability for the relevant role.

We will inform you about the relevant opportunity before submitting your identifiable profile to a client, unless you have already been informed. Only data necessary for the specific recruitment or staffing purpose will be shared and we only share personal data where there is a lawful basis to do so and appropriate safeguards are in place.

6. International Transfers

Your personal data may be transferred to and processed in countries outside the European Economic Area (EEA).

Where such transfers occur, we ensure appropriate safeguards are implemented, including:

- Adequacy decisions issued by the European Commission;
- Standard Contractual Clauses approved by the European Commission; or
- Other legally recognised transfer mechanisms.

7. How Long We Retain Your Data

For candidates who consent to be retained in the candidate database and talent pool, we retain relevant candidate- information for up to 36 months from the date you give your specific consent. We may contact you shortly before expiry to ask whether you wish to renew it. A new 36-month period begins only if you affirmatively renew your consent. Recruiter activity, applications, or routine interactions do not by themselves renew this separate consent. If consent is withdrawn or expires without renewal, we will stop candidate-pool use and delete or anonymise your data unless limited retention is necessary for a separate lawful purpose.

Sourced potential candidates: if we identify you through professional sources and contact you before receiving consent, we may temporarily process limited professional data on the basis of legitimate interests, normally for no more than 6 months after initial outreach where there is no response. Such profiles are not added to the long-term consent-based candidate pool unless you opt in.

Specific recruitment processes and legal claims: information needed for an ongoing application or to establish, exercise or defend legal claims may be retained separately under the applicable legal basis and a justified retention schedule. This processing is not automatically extended by talent-pool consent.

Withdrawal, objection and deletion: if you withdraw candidate-pool consent, object to legitimate-interest processing, or ask not to be contacted, we will respect that request subject to limited data necessary for legal claims or a do-not-contact suppression record.

8. Security of Your Personal Data

We implement appropriate technical and organisational measures to protect personal data against:

- Unauthorised access;
- Accidental loss;
- Destruction;
- Alteration;
- Disclosure.

These measures include access controls, encryption, secure systems, staff training, and regular security reviews.

9. Your Rights

Under GDPR, subject to applicable legal conditions, you have the right to:

- Request access to your personal data;
- Request correction of inaccurate data;
- Request deletion of your personal data;
- Request restriction of processing;
- Object to processing based on legitimate interests;
- Receive your data in a portable format where applicable;
- Lodge a complaint with a supervisory authority.

To exercise any of these rights, please contact us using the details provided above.

10. Right to Object

Where we rely on legitimate interests, you have the right to object on grounds relating to your particular situation. Separately, where we rely on consent for candidate-pool retention, you can withdraw that consent at any time without having to give a reason.

If you withdraw your consent for future recruitment opportunities, we will stop using your profile for that purpose. If you object to processing based on legitimate interests, we will assess and respond to your objection under Article 21 GDPR. We may retain limited suppression information to avoid re-contacting you, or information strictly necessary for legal claims.

11. Automated Decision-Making

We do not make recruitment decisions based solely on automated systems. Technology may support our recruitment process, but a person is always involved in decisions that could significantly affect candidates.

12. Changes to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in legal, regulatory, or operational requirements.

The latest version will always be available on our website.

Last Updated: 19 October 2026