

# Job Applicants Privacy Policy

## 1. Introduction

This privacy policy describes how Modus Therapeutics AB, org. no. 556669-2199, ("**we**", "**our**" and "**us**") as controller process your personal data in relation to you as an applicant for a position with us. As controller of your personal data, we are responsible for the processing of your personal data and it is to us you address any questions or concerns, or if you wish to exercise any of the rights you have in relation to our processing of your personal data.

We process personal data collected from you when you apply for a job with us or collected from others due to your application, such as your references. In this privacy policy we describe the types of personal data we process, the purposes for which the data is processed and the legal basis that the processing relies on. We also describe who can access and process the personal data, the principles of screening out and your rights in terms of information, rectification, deletion etc.

We may sometimes need to make updates or changes to this privacy policy. The date of the most recent update of this privacy policy is given at the top of the policy.

## 2. How we process your personal data

### 2.1 General

Personal data refers to data that can be attributed to you as a person. In this section we describe which of your personal data we may be processing, for which purpose or purposes and on what legal basis the processing takes place.

### 2.2 What categories of personal data do we process

The following categories of your personal data are normally processed by us when you submit your job application:

- Name
- Personal identity number
- Gender
- Email
- Telephone number
- CV
- Educations
- Qualifications
- Previous experience
- Previous employments

### **2.3 For which purposes do we process your personal data**

We process your personal data for the purposes of evaluating your job application and to be able to contact you in relation thereto. Should we initiate further contact with you based on your application, your personal data will be processed for the purpose of evaluating you as a candidate and potential hire.

### **2.4 Legal basis for our processing of your personal data**

The legal basis for our processing of your personal data is our legitimate interest in evaluating your job application and you as a candidate in order to appoint our vacancies.

## **3. Who will have access to your personal data**

3.1 The access to your personal data is limited to our personnel that require access to the data for the above mentioned purposes. Access to your personal data is usually restricted to the management and the HR department.

3.2 We may, sometimes, disclose your personal data to third parties related to our recruitment operations, for example recruitment companies assisting us in such operations. The legal basis for such disclosure is our legitimate interest in effectively evaluating your job application and you as a candidate in order to appoint our vacancies. We may also disclose your personal data to authorities when required by law, regulation or decision by court or government.

3.3 If another company within our group, a service provider, partner or a potential buyer/investor is established or operating outside the EU/EEA, we may transfer your personal data to such a country. Such a transfer will be carried out in accordance with applicable data protection legislation, for example by ensuring that the country of destination is ensuring an adequate level of protection of data protection according to the European Commission or through the use of standard contractual clauses issued by the European Commission to ensure appropriate measures to protect your rights and freedoms. For example, Microsoft, our provider of email and database systems, with servers both in the EU/EEA and in the US, is affiliated to the EU-US Privacy Shield.

## **4. Storage of your personal data**

We will only process the personal data associated with your job application during the time necessary for us in order to evaluate your job application or you as a candidate otherwise. Normally, this means that we will store your personal data for two years from our last contact with you. If your job application results in a position with us and we enter into an employment agreement with you, your personal data (including relevant parts of your job application) will instead be stored and processed in accordance with our privacy policy for employees.

## **5. Protection of your personal data**

Your personal data is stored on files that are only available to our employees, our agents and our service providers who need the information for their professional duties. We take appropriate protective measure and enforce security standards to protect your personal data from unauthorized access, unauthorized disclosure and abuse. We use technical tools such as firewalls and we ensure that our employees are educated in the importance of maintaining security and confidentiality in relation to the personal data we are processing.

If you have questions about how your personal data is collected, used, protected and shared or if you wish to exercise your rights as set out below, please contact us at [info@modustx.com](mailto:info@modustx.com).

## **6. Your rights**

- 6.1 You have the right to receive a clear and understandable confirmation of which of your personal data we are processing. You also have the right to access these personal data as well as information on how we are processing them.
- 6.2 You are entitled to have incorrect personal data concerning you rectified upon your request without unnecessary delay. Considering the purpose of the processing, you may also, in some cases, be entitled to supplement incomplete personal data.
- 6.3 You may, under certain circumstances, have your personal data deleted, e.g. if your personal data is no longer necessary to meet the purpose for which it was collected, if you have objected to the processing of personal data and we do not have a legitimate interest which carries more weight than your interest, if the personal data has been processed illegally or if the personal data must be deleted to comply with a legal obligation.
- 6.4 You may request that we restrict the processing of your personal data in certain cases if you contest the accuracy of the personal data during the time it takes for us to check if the information is correct, if the processing is illegal and you contest that the data is deleted and instead request a restriction, if we no longer need your personal data but you need it to determine, enforce or defend legal claims or if you have objected to a processing based on our legitimate interest during the time we check if our interest carries more weight than your interest.
- 6.5 You have the right to object to the processing of your personal data which is based on our legitimate interest. If so, in order to continue processing, we must be able to show compelling legitimate grounds that carry more weight than your interests, rights and freedoms.
- 6.6 If we process your personal data with an agreement with you as legal basis, you are entitled to obtain the personal data you have provided to us that concerns you in electronic format that is widely used when technically possible and this may be

carried out in an automated way. You are entitled to, when applicable, transfer such data to other controllers (data portability).

6.7 You are entitled to complain about the processing of your personal data by filing a complaint to the Swedish Data Protection Authority.

**7. Contact details**

In order to update, rectify or delete any information that we have about you or otherwise to exercise any of your rights set out above, please contact us on [info@modustx.com](mailto:info@modustx.com).