

Job Applicants Privacy Statement (Europe)

This Job Applicants Privacy Statement was updated on 22 April, 2024.

Tasman Global Holdings B.V. is an international consulting firm dedicated to the provision of healthcare IT services. This Job Applicants Privacy Statement describes how Tasman Global Holdings B.V. and its affiliates (hereinafter: "Tasman", "we", "us" or "our") collect, process, and transfer personal data about job applicants. It also explains how your personal data is protected and what choices you have relating to your personal data. If you have any questions about this Job Applicants Privacy Statement, the processing of your personal data by Tasman, or if you wish to exercise your privacy rights please contact our Data Protection Officer at dataprivacyoffice@nordicglobal.com

1. Who is responsible for the processing of your personal data?

Tasman Global Holdings B.V. headquartered in Amsterdam is responsible for the processing of your personal data and acts as 'controller' within the meaning of the General Data Protection Regulation ('GDPR'). This Job Applicants Privacy Statement applies to our processing of your personal data when you apply for a position with us. This Job Applicants Privacy Statement may be supplemented by other privacy statements from us.

2. What personal data do we collect in connection with your job application?

We may collect the following information that you provide to us or that we collect during the recruitment process:

- Full name, date of birth and gender;
- Contact details (e.g., telephone numbers, email, and address);
- Information from your publicly available LinkedIn profile (e.g., your name, contact details, work history, and other data included on your profile);
- CV/resume, cover letter and any other documents that you share with us;
- Name and contact details of references that you provide to us;

- Social Security Number and/ or another national identifier.
- Work history (e.g., work experience, previous or other employment);
- Education history;
- Skills required for the position (licenses or certifications, languages including proficiencies, specialties, strengths, and weaknesses, assessments of qualifications, eligibility for a secondment);
- Professional memberships;
- Relocation and travel capability details (willingness to relocate, expat status, whether you hold a passport, work rights);
- Availability;
- Information on the position you apply for (e.g., salary, position, department, type of employment contract, payment structure, full time, or part time status);
- Correspondence with you including information about your questions;
- Interview notes; and
- Other information that you voluntarily provide to us.

Special Categories of Personal Data: We may process special categories of personal data (e.g. Health Information) only if you have provided your consent to the processing of this personal data for one or more specified purposes, or if the processing is required or permitted by applicable law.

3. How do we obtain your personal data?

We may obtain your personal data from the following sources:

- Information that you provide to us;
- Your publicly available LinkedIn profile;
- Third parties engaged by Tasman, such as recruitment or assessment companies;
- Clients; and
- Referees, e.g. former employers, etc.

4. Why do we process your personal data and what are the legal grounds for processing your personal data?

We may use your personal data for the following purposes:

- a. To approach you about a vacancy, for example, via LinkedIn.
- b. To communicate with you about your application, the recruitment process, and the on-boarding process if we offer you a position with us.
- c. To conduct the recruitment process, including to evaluate and assess your experience, skills, and to determine your suitability for the position.
- d. If you apply for a project of one of our clients, to assess your suitability for the project, we may determine this together with the client for which purpose we may share details of your application, such as your CV, with our client.
- e. To assess your suitability for available positions at one of our affiliates and to invite you to apply for a position at our affiliates. For this purpose, we will share your application data with our affiliates.
- f. To maintain our internal administration.
- g. To improve our recruitment process and experience.
- h. To exercise or defend claims.
- i. To retain your application so we or our affiliates can contact you about future opportunities at Tasman or at our affiliates.
- j. To comply with legal or regulatory obligations and orders including court orders.

Legal grounds for the above is as follows:

a-i Legitimate interests: The processing for these purposes is necessary for legitimate interests pursued by us. We have taken your privacy interests into account in the processing; therefore, when balancing these interests, our legitimate business interests prevail to the extent that they would conflict.

j Legal obligations: Processing is necessary to comply with our legal and regulatory obligations for administrative, accounting and tax purposes or if we are compelled to provide information to a government authority or law enforcement agency.

Automated Decision-Making: In the context of our recruitment activities, no form of automated decision making - including profiling - is undertaken by Tasman.

5. What personal data do we use for which purposes?

Below, we specified per category the personal data that we may process about you (as included under *section 4 Why do we process your personal data and what are the legal grounds for processing your personal data?* and for which purpose(s) we may process this information. The numbers refer to the purposes as stated above.

- **Full name, date of birth and gender.**
 - We may process this information for purposes: a-j.
- **Contact details (telephone number, email, and home address).**
 - We may process this information for purposes: a-j.
- **Information from your publicly available LinkedIn profile (e.g., your name, contact details, work history, and other data included on your LinkedIn profile).**
 - We may process this information for purposes: a, b.
- **CV/resume, cover letter and any other documents that you share with us.**
 - We may process this information for purposes: a-j.
- **Name and contact details of references that you provide to us.**
 - We may process this information for purposes: c-j.
- **Work history (e.g., work experience, previous or other employment).**
 - We may process this information for purposes: a-j.
- **Education history**
 - We may process this information for purposes: a-j.
- **Skills required for the position (licenses or certifications, languages including proficiencies, specialties, strengths, and weaknesses, assessments of qualifications, eligibility for a secondment).**
 - We may process this information for purposes: a-j.
- **Professional memberships.**

- We may process this information for purposes: a-j.
- **Relocation and travel capability details (willingness to relocate, expat status, whether you hold a passport, work rights).**
 - We may process this information for purposes: b-j.
- **Availability.**
 - We may process this information for purposes: b-j.
- **Information on the position you apply for (e.g., salary, benefit plan, position, department, type of employment contract, payment structure, full time, or part time status).**
 - We may process this information for purposes: b-j.
- **Correspondence with you including information about your questions.**
 - We may process this information for purposes: b-j.
- **Interview notes.**
 - We may process this information for purposes: b-j.
- **Other information that you voluntarily provide to us.**
 - We may process this information for purposes: a-j

6. Who will have access to your personal data?

We may share your personal data with the following entities under the conditions described in this Job Applicant Privacy Statement and for the following purposes:

Our affiliates that are jointly responsible for the processing of your personal data as a relevant data controller for internal administrative purposes, to determine suitability for a vacancy at one of our affiliates and to retain your application data (for a maximum period of one year) and to contact you if suitable vacancies become available at our affiliates. Our affiliates are:

- Tasman Group Ltd, based in United Kingdom;
- Hygeian Consulting Limited in United Kingdom;
- Tasman Global Singapore Pte Ltd, based in Singapore;
- Tasman Global Healthcare Ireland, based in Ireland;

- Tasman Global Switzerland GmbH, based in Switzerland;
- Tasman Global Norway AS, based In Norway;
- Nordic Consulting Partners, Inc. based in the United States;
- Nordic Consulting Group Incorporated, based in the United States;
- Healthtech Inc. based in Canada and,
- Nordic Philippines Technology Solutions, Inc. based in the Philippines.

Where personal data is transferred to our affiliates, we use an intra-group data agreement to ensure that your personal data is protected. Tasman Global Holdings B.V., is the main data controller and your main point of contact for the processing of your personal data.

Our clients If you apply for a project of one of our clients, we may share your personal data with our client to determine your suitability for the project together with the client. For example, we may share your CV/Resume for that purpose. When we share your personal data with our client, we are responsible with the client for the processing of your personal data. We conclude appropriate agreements with our clients to ensure that all personal data is protected and processed in accordance with the applicable data protections laws. We remain the main point of contact for all issues relating to the processing of your personal data.

Service providers such as providers of hosting services, relocation services and pre-employment assessment and screening services. We conclude appropriate data processing agreements in line with the applicable data protection laws.

Other third parties to the extent necessary to: (i) comply with a request from a government authority or law enforcement agency, a court order or applicable law; (ii) to prevent violations of our agreements and our policies; (iii) to defend ourselves against claims or when you have provided your consent.

If we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation) we may also transfer your personal data.

7. How do we transfer your personal data outside the EEA?

The processing of your personal data for HR purposes may entail the transfer of your personal data within the group to our affiliates or to selected third parties that are located outside the European Economic Area (EEA) and your personal data may be stored on servers outside the EEA. When your personal data are transferred to or are accessed from countries outside of the EEA, we are required to ensure that your personal data is subject to an equivalent level of protection as it would receive within the EEA (e.g. EU-U.S Data Privacy Framework EU-U.S DPF). We take the necessary steps to ensure that your data is kept securely and handled in accordance with this HR Privacy Statement and applicable laws.

We may transfer personal data to countries that are not considered to provide an adequate level of protection according to the applicable data protection laws. When we do so, we take appropriate (supplemental) safeguards to ensuring an equivalent level of data protection by concluding the Standard Contractual Clauses of the European Commission or International Data Transfer Agreement or UK Addendum with the receiving party located in such third country in accordance with the General Data Protection Regulation (GDPR) and GDPR UK.

8. How long do we retain your personal data?

We will not retain your personal data longer than necessary in relation to the purposes for which the personal data are processed, unless otherwise required or permitted by law. This means that:

- If your application is rejected, we will retain your personal data for up to a maximum period of one year.
- If we offer you a position at Tasman, we will retain your personal data as part of your personnel file in accordance with our HR Privacy Statement.

9. How do we protect your personal data?

We are committed to ensuring that your personal data is kept secure. We use a variety of physical, technical, and organisational measures to maintain the safety of your personal data. Some of the technical and organisational measures taken by us include:

Technical security measures:

- Logical and physical security equipment (e.g. firewall, network segmentation).
- Technical control of the authorisations and keeping log files.
- Management of the technical vulnerabilities (patch management).
- Making back-ups to safeguard availability and accessibility of the personal data.
- Modern encryptions of connections and certain equipment is in place and monitored.
- Using multi-factor authentication for certain systems.

Organizational security measures:

- Assignment of responsibilities for information security.
- Promotion of security awareness among new and existing employees.
- Establishment of procedures to test, assess and evaluate security measures periodically.
- Checking and monitoring of log files done regularly.
- Implementation of a protocol for the handling of data breaches and security incidents.
- Implementation of least privilege practices to ensure only the people in the organization who need to see the data are allowed to access it.
- Prevention of fraud and abuse.

10. Which privacy rights do you have?

As a data subject, you have certain rights concerning our processing of your personal data. You can:

- **Request access to your personal data held by us:** You can ask us whether we process your personal data and, if so, to provide you with a copy of that personal data.
- **Request us to rectify or complete your personal data:** If you believe the personal data we process about you is inaccurate or incomplete, you can ask us to rectify it.
- **Request us to erase certain personal data:** You can ask us to delete or remove your personal data in some circumstances.

- **Request us to restrict the processing of your personal data:** You can ask us to restrict the processing of your personal data in some circumstances, such as when you contest the accuracy of the personal data.
- **Object to our processing of your personal data:** You can object to our processing of your personal data and ask us to suspend such processing at any time if we rely on our own or someone else's legitimate interests to process your personal data or where we process your personal data for direct marketing purposes. When we rely on legitimate interests, we may continue processing your personal data if we can demonstrate compelling legitimate grounds, which we will consider on an individual basis.
- **Request not to be subject to automated decisions, including profiling:** You have the right not to be subject to a decision based solely on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you.
- **Request to port your personal data:** You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used, and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Request to withdraw your consent:** If we rely on your consent for processing your personal data, you have the right to withdraw that consent at any time. Such withdrawal will not affect the lawfulness of the processing before you withdrew your consent.
- **Lodge a complaint with a supervisory authority:** If you have a concern about the way we have handled your personal data, you can lodge a complaint with your local supervisory authority.

You may send us a request using the contact details below. We will handle your request carefully and in line with the applicable data protection rules. We will respond to you without undue delay and at the latest within one month of receipt of your request in line with the applicable data protection rules. We may need to identify you and obtain proof of your identity to be able to respond to your request.

11. How can you contact us?

We welcome any questions, comments, or concerns regarding our processing of your personal data and/or our privacy practices. If you have any questions, or

wish to exercise your privacy rights, please contact us by using the following contact details:

If you have any queries regarding this HR Privacy Statement, you can contact our Data Protection Officer (DPO) via:

General Enquiries dataprivacyoffice@nordicglobal.com

Postal Address - Data Protection Officer

Lorcan McLoughlin

Data Protection Officer

Nordic Global

7 Riverwalk,

Citywest,

Dublin 24,

Ireland,

D24 H2CE

Republic of Ireland

12. Changes to this Job Applicants Privacy Statement

Applicable law and our recruitment practices may change over time. This Job Applicants Privacy Statement may be updated to reflect such changes. We recommend to regularly review this Job Applicants Privacy Statement.