

Candidate Privacy Notice

We take privacy seriously. This notice tells you who we are, what information about you we collect, and what we do with it. We will use information about you only in accordance with applicable data protection laws.

For anything not contemplated by this notice, we may issue a supplemental notice. You should read any supplemental notice in conjunction with this notice.

This notice applies to all candidates, interns and existing employees applying to a position at Aspeya.

In the section introduced as “What rights and options do you have?”, you can also find information about your rights.

Who we are?

This candidate privacy notice is issued by the Aspeya group of companies, which is made up of a number of companies or “affiliates” as set out at the end of this notice.

“We” (or “us” or “our”) refers to Aspeya, Inc. and its affiliates.

When you set up a candidate profile or apply for a job, you provide information about yourself to each affiliate, and each affiliate may process information about you for its own recruitment purposes. This is the case even where you respond to a job posting that mentions a particular affiliate or country/territory.

How do we collect information about you?

In order to ensure an effective recruitment process, we may collect information about you in various ways as follows:

- You may provide us with information directly (e.g. when creating an account, creating a candidate profile, applying for a job, attending an interview, completing a test/assessment, sending an e-mail, or making a call to us).
- We may collect information automatically when you interact with our systems or we communicate with you (e.g. when you use a company app or website or, where we use technologies to observe when you receive or open e-mails or receive SMS messages).

- We may also acquire information from third parties (e.g. from recruitment agencies, referrals, reference providers, test/assessment providers, (where permitted by law) background screening providers and publicly-available sources, such as a company website, internet searches or social media platforms such as LinkedIn).

In this notice, we refer to all the methods by which you are in contact with us as “touchpoints”. Touchpoints include both physical (for example, offices, careers fairs and events) and digital (for example, apps and websites). We may also collect information in other contexts made apparent to you at the time.

More details

We may collect information that you provide directly. Typically, this will happen when you:

- sign up to be a member of our databases (this could be, for example, in person, via an app, or online when you create an account and a candidate profile);
- submit a job application and supporting information to us;
- participate in an interview;
- complete a test/assessment;
- provide job acceptance, background screening and on-boarding information (where applicable);
- download, or use, a digital touchpoint (e.g., an app or a website);
- contact us through a touchpoint, or by e-mail, social media or telephone;
- register to receive press releases, e-mail alerts, or job updates;
- participate in surveys or (where permitted by law) competitions or promotions; or
- attend an event that our affiliate has organized.

We may collect information from an electronic device, if you choose to send the information to us. This may be shared with us through a direct connection to the internet, or via one of our apps that you may download.

We may collect information about you automatically. Typically, this will happen when you:

- visit our offices (e.g., through video (CCTV) recording and building access logs);
- complete online skills and aptitude tests (including online and via video recording);
- attend an event that our affiliate has organized (e.g., through sensors at the event that connect with mobile technology);
- use our systems or Aspeya-issued devices such as a laptop;
- communicate with us (for example, through a touchpoint; or by e-mail, or social media platforms);
- use our touchpoints (e.g., such as cookies and web beacons/pixels); or
- make public posts on social media platforms that we follow (for example, so that we can understand public opinion).

As mentioned above, we may collect information about you automatically through the use of cookies and similar tracking technologies (such as web beacons/pixels) that you receive when you visit digital touchpoints or get an e-mail electronic message from us. The specific cookies and other mechanisms used will depend on the touchpoint in question. To learn about these mechanisms used on a touchpoint, including how you can accept or refuse cookies, please see the information made available on or through that touchpoint. These mechanisms may include Google analytics cookies (see [www.google.com/policies/privacy/partners/.](http://www.google.com/policies/privacy/partners/))

Where permitted by law, we may acquire information about you from third parties. This may include:

- information from recruitment agencies;
- information provided by employees making referrals;
- information shared between our affiliates;
- information from third party social media sites (for example, if you want to upload information to the platform (for example, from LinkedIn or Indeed) instead of manually completing an application); and
- publicly available profile information (such as your experience, skills and interests) on third party social media sites (such as LinkedIn).

We may also collect information in other contexts made apparent to you at the time.

What information about you do we collect?

We may collect various types of information about you (always within the scope permitted by law):

- information necessary to manage and administer our relationship with you (including, where we agree, to reimburse certain expenses to attend interview) and to run our business, including to meet our legal and regulatory obligations (e.g. verifying your identity, your right to work, application details and, where permitted by law, your suitability for a job using background checks)
- information you give us in your candidate profile, job application, forms or surveys
- information necessary to assess your eligibility for a role, shortlist and select candidates
- information about your visits to our offices and attendance at events
- where applicable, information necessary to offer you a job and on-board you (such as issuing an offer, drafting an employment contract, providing benefits information or to ensure benefits are in place when you join, and arranging access to systems)
- information gathered as part of our monitoring and continuous improvement of the recruitment process
- information you give us in calls you make to us or e-mails you send to us
- information about your preferences, interests and career aspirations (including information that we infer from other information, for example from statistical information)
- information gathered as part of business analytics and improvements
- details of your use of digital touchpoints
- statistical information about you (for example, statistical information about people in certain geographical areas)

More details

Information that we collect from you directly will be apparent from the context in which you provide it. For example:

- during the application and recruitment process, you provide your name, contact details, skills, qualifications, experience information, and, where we agree, information (such as your bank account details) to allow us to reimburse certain expenses to attend interview);
- during any interview or assessment, you provide answers to questions;
- you may provide information on your career aspirations and interests so that we can send you relevant opportunities; and
- we may collect information that enables us to verify your identity and right to work, for example, a copy of an identity document or your facial image.

Information that we collect automatically will generally concern:

- details of your visits to our offices, attendance at interviews, assessments, and events (such as time and duration);
- details of your use of PMI touchpoints (such as applications/information accessed, time and duration, information searched);
- your devices (such as IP address or other unique device identifier, location data, details of any cookies that we may have stored on your device);
- your use of PMI digital touchpoints (such as the pages you have visited, the page from which you came, and the page that you move to, search terms entered, links clicked within the touchpoint, when you first open the touchpoint, for how long you use it, and how you interact with messages we send you or advertisements we show you). We may use cookies and similar tracking technologies (such as pixels/web beacons) to do this; and
- your use of third-party websites, where the information collected will be similar to that described in the bullet above. We may use cookies and similar tracking technologies (such as pixels/web beacons) to do this.

Information that we collect from third parties will generally consist of:

- your basic contact information where you are referred for an opportunity by an employee.
- job application information from recruitment agencies (where you apply for a role via a recruitment agency);
- references and work certificates from your previous employers or your other reference providers.
- where permitted by law, background screening information as appropriate for the role (such as identity document validation, address verification, confirmation of qualifications and employment history, searches against sanctions and politically exposed persons lists, and details of any convictions);
- profile information from third party social media sites (for example, if you want to upload information to the platform (for example, from LinkedIn or Indeed) instead of manually completing an application); and

- publicly-available profile information (such as your role, skills, qualifications, experience and interests, for example from a company website, internet searches or on social media platforms such as LinkedIn).

Information we collect and process about you may include your:

- full name including preferred name
- password
- address including home and correspondence
- contact details including personal e-mail address and home/personal mobile phone number where these details are provided as part of your application
- gender
- cover letter
- nationality
- residence status
- preferred language and/or language proficiency
- resume/job application, including personal and professional information
- how you heard about the job
- geographical mobility and sponsorship
- eligibility to work, including passport or other official identification document
- references
- qualification transcripts and certificates
- education and employment history
- information about military service
- jobs applied for
- current, expected and offered employment terms and conditions (e.g. pay, hours of work, holidays, benefits, notice period)
- interview notes and assessment results
- application outcome and reason
- reason for withdrawing your job submission (where applicable)
- social insurance and personal income tax data
- tax code
- date and place of birth
- family status, family members and situation

- bank account information (if we agree to reimburse you certain expenses to attend interview, or if you are offered a job and accept it)
- photographs and video recordings
- system user information
- automated records of your use of company information systems
- information submitted to us when using information systems that the company operates
- information about your visits to our offices and events

We may also collect and process special categories of information about you such as your:

- racial or ethnic origin (e.g. for equal opportunities monitoring)
- political opinions (only if you voluntarily share this information)
- religious or philosophical beliefs (e.g. for reasonable accommodation)
- sexual orientation (e.g. for equal opportunities monitoring or if you voluntarily share this information)
- trade union membership (only if you voluntarily share this information)
- data concerning your health, including any disability (e.g. for reasonable accommodation)

We will process these types of data if you voluntarily share them with us, if we have a legal obligation to process the information and, in relation the recruitment process, to provide reasonable accommodation.

For what purposes do we use information about you, and on what legal basis?

In this section, we describe the purposes for which we use personal information. However, this is a global notice, and where the laws of a country restrict or prohibit certain activities described in this notice, we will not use information about you for those purposes in that country.

Subject to the above, we use information about you for the following purposes:

- perform checks on identity, role eligibility and right to work
- verify employment history, qualifications, experience and references
- where permitted by law, perform candidate vetting and background screening
- perform recruitment and selection, including interviews, assessments, and psychometric profiling, shortlisting, job offer and benefits (where applicable)
- business administration, including record keeping obligations

- where applicable, administration of reimbursement of expenses to attend interview
- where applicable, pre-employment administration and management, including preparation of contractual and non-contractual documents, benefits enrolment and arranging systems and building access
- monitoring of the recruitment process
- for business analytics and improvements, including for our recruitment process, events, digital touchpoints, company systems and devices and the information that we (or our affiliates) provide to job candidates

The legal basis for our use of information about you is one of the following (which we explain in more detail below):

- compliance with a legal obligation to which we are subject
- to take steps at your request prior to entering into a contract
- a legitimate business interest that is not overridden by interests you have to protect the information
- where none of the above applies, or where law requires it, your consent (which we will ask for before we process the information)

More details

The purposes for which we use information about you, with corresponding methods of collection and legal basis for use are:

Purpose	Method of collection and legal basis for Processing
<p><u>Comply with regulatory obligations</u></p> <ul style="list-style-type: none"> • identity and right to work checks • assessing the demographic makeup of our workforce, such as equal opportunities monitoring 	<p>This information is generally provided to us by you directly.</p> <p>We use it because it is necessary for us to comply with a legal obligation to employ only people with a right to work in the country where the job is located and to monitor the demographics of our workforce, or, in countries where there is no such legal obligation, because we have a legitimate business interest to run our business in accordance with good</p>

	<p>practice requirements that is not overridden by your interests, rights and freedoms to protect information about you.</p>
<p><u>Application verification and candidate vetting (where permitted by law)</u></p> <ul style="list-style-type: none"> • verifying employment history, qualifications, experience and references • where permitted by law, candidate vetting and background screening 	<p>This will typically be a combination of information that you provide directly (as part of your application) and, during the later stages of our recruitment process, information that we collect from third parties such as references and (where permitted by law) criminal record checks.</p> <p>We use it because it is necessary for us to comply with a legal obligation to employ only eligible and suitable people, or, in countries where there is no such legal obligation, we use it because we have a legitimate business interest in ensuring your suitability and eligibility for a role with us that is not overridden by your interests, rights and freedoms to restrict use of information about you.</p>
<p><u>Recruitment and selection</u></p> <ul style="list-style-type: none"> • candidate recruitment and selection, including interviews, recorded videos, assessments, psychometric testing • review of application forms and online assessment tools and skills tests • shortlisting • where applicable, administering reimbursement of certain expenses to attend interview • where applicable, making an offer and agreeing benefits • group, panel and individual interviews 	<p>This will typically be a combination of information that you provide directly (at various stages during the recruitment process) and, information that we collect from third parties such as any recruiter or social media platform you use to share information about you with us.</p> <p>We use it because we have a legitimate business interest in recruiting and selecting candidates for roles with us (including carrying out interviews and assessments), administering the process, and keeping records of the recruitment process, that is not overridden by your interests, rights and freedoms to restrict use of information about you.</p>

<p>informing you of the outcome of applications and of other opportunities that may be of interest, advertising positions, and monitoring interest</p> <ul style="list-style-type: none"> • record keeping 	
<p><u>Pre-employment workforce management</u></p> <ul style="list-style-type: none"> • hiring activities such as preparing, issuing and signing employment contract • establishing electronic personal record and personal files • creating payroll records • enrolling new employee benefits • reporting employment commencement to legal authorities 	<p>This information is collected during the later stages of our recruitment process and during the processing of job offer and/or acceptance.</p> <p>We use it because we have a legitimate business interest in preparing necessary employment documents and completing necessary internal records not overridden by your interests, rights and freedoms to restrict use of information about you. In the case of reporting to legal authorities we do so because it is necessary for us to comply with legal obligations.</p>
<p><u>Monitoring of the recruitment process</u></p> <ul style="list-style-type: none"> • quality control and checks to monitor compliance with our recruitment process 	<p>This information is collected throughout our recruitment process.</p> <p>We use it because we have a legitimate business interest in checking compliance with our recruitment process that is not overridden by your interests, rights and freedoms to restrict use of information about you.</p>
<p><u>Support for all the above purposes</u></p> <ul style="list-style-type: none"> • administering your accounts • enabling you to use touchpoints (for example, allowing you to remain logged in to sections of a touchpoint that are reserved for authorized users only, and administering your language preference) 	<p>This will typically be a combination of information that you provide to us (name, password (or equivalent)) and information that we collect automatically (for example, information about your device, and cookies and similar tracking technologies).</p> <p>We use it on the grounds that correspond to the purpose for using the information that we are supporting. For example,</p>

<ul style="list-style-type: none"> • corresponding with you • managing your appointments with us (for example, regarding an interview or assessment) • enhancing your experiences • administration and troubleshooting 	<p>where we administer your account to support a job search or application, we use the information on the grounds that we have a legitimate business interest to run our business and recruit staff that is not overridden by your interests, rights and freedoms to protect information about you.</p>
<p><u>Business analytics and improvements</u></p> <ul style="list-style-type: none"> • assessing the effectiveness of our recruitment process • business analytics and improvements (including for our recruitment process, events, digital touchpoints and the information that we (or our affiliates) provide to job candidates) 	<p>This will typically be a combination of information that you provide to us; information that we collect automatically; and (where permitted by law) information that we acquire from third parties.</p> <p>We use it on the grounds that we have a legitimate business interest to analyse, assess the effectiveness of and improve our recruitment efforts, processes, touchpoints, and events that is not overridden by interests, rights and freedoms to protect information about you.</p>

Where we do not base our use of information about you on one of the above legal bases, or where law requires it, we will ask for your consent before we process the information (these cases will be clear from the context). We may ask for your explicit consent to process special categories of information about you.

In some instances, we may use information about you in ways that are not described above. Where this is the case, we will provide a supplemental privacy notice that explains such use. You should read any supplemental notice in conjunction with this notice.

Do we use Artificial Intelligence or make automated decisions?

We may use the following Artificial Intelligence (AI) features during the recruitment process.

Our candidate portal has built in AI that contains a number of features, including making personalized job recommendations to you based on your location, experience, and preferences.

For example, the candidate portal has a feature which ranks every candidate's application, much like the way in which a recruiter reviews written materials provided as part of the recruitment process and ranks candidates' application for a job advertisement based on relevant skills and experience. This feature uses advanced language processing to analyse our written job description and compares this with the written information that you have provided as part of your application to us. This feature calculates a grade based on several criteria such as: job title, years of experience, skills, and location. The grading (e.g., A, B, C, or No Fit (with A indicating the highest match)), helps recruiters to understand how well-suited you are for the position. The ranking is determined using AI that is powered by explicit and implicit data. Explicit data encompasses all information you have shared with us, including skills, work experience, current job title, and location information. The candidate portal extracts keywords from this data and stores it in your profile, with these keywords. The candidate portal can also infer similar or related keywords that can further augment our understanding of your skills based on pre-existing data regarding job titles and experience. By combining these data sources, the candidate portal provides a measure of how likely you may fit the requirements of the role that you are applying for.

The actual ranking and matching process depends on the specific criteria and the relative weight assigned to each criterion based on the role. For example, the highest score is given to exact matches (a "sales representative" candidate matches to a "sales representative" job), and a partial score is given to similar matches (a "business development" candidate matches to a "sales representative" job). Contextual information can guide the relative weight of each score component. For example, for a job such as "truck driver," more weight may be given to the title match score, because a candidate who already has that title is more likely to meet the minimum requirements of the role. By contrast, for a job such as "software engineer," the skills match score would also have high weight, because the overall fit score should reflect skills such as specific programming languages.

Criteria, such as skills and experience, of current employees who hold the same position may also be considered, to provide examples of ideal candidates for a role and improve the accuracy of the ranking and matching process.

The candidate portal may also have a chatbot feature to answer frequently asked questions and help you navigate through the portal by assisting you to search for jobs, apply for jobs more easily and build a profile when you provide your information (such as current job title, preferred location, or your resume) directly through the chatbot.

Also, we may use AI features during the digital interview for some roles. In particular, digital interviews use a natural language processing feature to transcribe your responses from audio (what you say) to text and then to compare it with job-related competencies critical for success in these roles. Your response will be scored and used to assist recruiters in identifying candidates most likely to have the job-related competencies needed for success.

In this way, an AI model initially assists recruiters in identifying candidates for interview but does not make hiring decisions on its own. PMI recruiters will always review applications from all grades, including incomplete profiles that may not have loaded correctly into our system.

No automated decision-making is used to make any final hiring decisions and the information that you provide will always ultimately be assessed in person by a recruiter or hiring manager when making a hiring decision.

If we use any automated decision making, we will draw this to your attention at the time, together with information about the logic involved in the decision, as well as the significance and the envisaged consequences for you of such use of your information.

Additionally, we may use third party technology providers that embed AI in their technology products (such as Microsoft). For example, translating data from your emails or documents that you provide to us in the context of your application. Such technology products may include AI features such as speech-to-text and text-to-speech capabilities.

Who do we share your information with, and for what purposes?

We may share information about you with:

- Companies in the Aspeya group of companies; its owner, Philip Morris Inc. and its affiliates;
- third parties who provide the company or you with products or services (such as recruitment agencies, background screening, online assessment providers and vendors that support the company's endeavours to improve the candidate experience); and
- other third parties, where required or permitted by law (such as regulatory authorities; government departments; past, potential or future employers; and in the context of organisational restructuring).

We share information about you with others only in accordance with applicable laws. Thus, where law requires your consent, we will first ask for it.

More details

Sharing data with PMI group affiliates

Aspeya group of companies is a part of the Philip Morris International (PMI) group of businesses.

Information about you may be shared with PMI affiliates (for example, Philip Morris Products S.A. and Philip Morris International IT Service Centre Sàrl based in Switzerland) which are the place of central administration of personal data processing for PMI group, technology or service provider for Aspeya group affiliates, or assist us with the recruitment process. PMI group affiliates may process the information about you for all the purposes described in this notice.

Sharing data with third parties

We may share information about you with third parties who provide us or you with products or services (such as recruitment agencies, background screening providers, online assessment providers, information services providers and identity verification providers).

We may share information about you with other third parties, where required or permitted by law, for example: regulatory authorities; government departments; in response to a request from law enforcement authorities or other government officials; when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; and in the context of organizational restructuring.

If we arrange travel or accommodation for you (e.g., if you need to travel to attend an interview), information about you may be shared with third parties who arrange travel and accommodation, provide transport or travel-related services, such as travel agents, online booking providers, ticketing agents, airlines, car hire companies, rail providers and hotels. These third parties will use information about you for their own purposes (for example, to discharge their obligations to provide transport or accommodation to you) and you should check their privacy notices for further details about their use of information about you. Note also that you may have rights, exercisable against such third parties, in respect of their processing of information about you.

Where might information about you be sent?

As with any multinational organization, we transfer information globally to affiliates of the group of companies that we belong to and service providers. Your data may therefore be transferred to other countries as part of our standard operations. Accordingly, information about you may be transferred either within or outside the country or territory where it was collected, including to a country or territory that may not have equivalent data protection standards. For example, if you are in the European Economic Area ("EEA"), UK or Switzerland, your information may be transferred outside that area.

Wherever we transfer personal data to other countries, we will take legally required steps to ensure that appropriate safeguards are in place to protect it. We will limit access to your data only to those who need to see it, process your data in accordance with our internal data protection standards, protect it appropriately and only transfer information in compliance with applicable data privacy laws. When data is transferred, we will require the receiving party to keep your data confidential, delete it when it is no longer required and act in accordance with this privacy notice.

You may contact us for an explanation of the basis on which we have transferred your personal data and, where relevant, to request a copy of the legal safeguards we have put in place.

How do we protect information about you?

We implement appropriate technical and organisational measures to protect personal information that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use reasonable acceptable means to protect your information, we cannot guarantee its absolute security or confidentiality. We also require our service providers to comply with equivalent data privacy and security requirements.

How long will information about you be kept?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected in accordance with our internal data retention standards. After that, we will delete it. The period will vary depending on the purposes for which the information was collected. Note that in some circumstances, you have the right to request us to delete the information. Also, we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes, to either retain the information for a set minimum period of time, or to delete it after a set maximum period

of time.

More details

Typically, we retain data based on the criteria described in the table below. Where these periods conflict with legal obligations, for example, for tax and accounting purposes, to either retain the information for a set minimum period of time, or to delete it after a set maximum period of time, we apply those set periods instead.

Type	Explanation/typical retention criteria
Recruitment process data	<p>If you apply for a job with us, we will keep a record of your application and retain it while it remains relevant to our relationship, for example during the recruitment process, to tell you about other opportunities that may be of interest and, if your application is successful, during your employment with us.</p> <p>Typically, information about you is kept for up to 24 months after the date on which you last logged into the recruitment platform. As a minimum, we keep records of the recruitment process for the statutory period in which a claim arising from the recruitment process may be brought. We may keep information about you for longer if you apply for certain types of jobs and this is allowed or required in the country where that job is based.</p> <p>Other records relevant to the recruitment process (for example, assessment results and background checks) are retained for a short period until more permanent records are made (for example, a record of the result of the assessment or background check).</p>
Visitor records	<p>If you visit our buildings, visitor records are retained typically for a period of only a few months.</p>
CCTV	<p>If you visit our buildings, CCTV records are retained typically for a period of only a few days.</p>

System audit and fraud prevention	System audit logs are retained typically for a period of up to 6 months for system recovery and for up to 10 years for fraud prevention.
Business analytics	Business analytics data is typically collected automatically when you use PMI touchpoints and anonymized/aggregated shortly afterwards.

What rights and options do you have?

You may have some or all of the following rights in respect of information about you that we hold:

- request us to give you access to it;
- request us to rectify it, update it, or erase it;
- request us to restrict our using it, in certain circumstances;
- object to our using it, in certain circumstances;
- withdraw your consent to our using it;
- data portability, in certain circumstances; and
- lodge a complaint with the supervisory authority in your country (if there is one).

We offer you easy ways to exercise these rights, such as “unsubscribe” links, by logging in to your account and using the self-service function, or by using the contacts in the paragraph “who should you contact with questions?” at the end of this notice.

More details

The rights you have depend on the laws of your country. If you are in the EEA, UK or Switzerland, you will have the rights set out in the table below. If you are elsewhere, you can contact us to find out what rights apply to you (see the paragraph “who should you contact with questions?” at the end of this notice) or look at the specific section for your country below.

Right in respect of the information about you that we hold	Further detail (note: certain legal limits to all these rights apply)
To request us to give you access to it	<p>This is confirmation of:</p> <ul style="list-style-type: none"> · whether or not we process information about you; · our name and contact details; · the purpose of the processing; · the categories of information concerned; · the categories of persons with whom we share the information and, where any person is outside the UK/ EEA/Switzerland and does not benefit from a European Commission adequacy decision, the appropriate safeguards for protecting the information; · (if we have it) the source of the information, if we did not collect it from you; · (to the extent we do any, which will have been brought to your attention) the existence of automated decision-making, including profiling, that produces legal effects concerning you, or significantly affects you in a similar way, and information about the logic involved, as well as the significance and the envisaged consequences for you of such use of information about you; and · the criteria for determining the period for which we will store the information. <p>On your request we will provide you with a copy of the information about you that we use (provided this does not affect the rights and freedoms of others).</p>
To request us to rectify or update it	This applies if the information we hold is inaccurate or incomplete.

<p>To request us to erase it and in some cases an extension of this right, the right to be forgotten</p>	<p>This applies if:</p> <ul style="list-style-type: none"> · the information we hold is no longer necessary in relation to the purposes for which we use it; · we use the information on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all information about you in which case we will respect your wishes); · we use the information on the basis of legitimate interest and we find that, following your objection, we do not have an overriding interest in continuing to use it; · the information was unlawfully obtained or used; or · to comply with a legal obligation.
<p>To request us to restrict our processing of it</p>	<p>This right applies, temporarily while we look into your case, if you:</p> <ul style="list-style-type: none"> · contest the accuracy of the information we use; or · have objected to our use of the information on the basis of legitimate interest <p>(if you make use of your right in these cases, we will tell you before we use the information again).</p> <p>This right applies also if:</p> <ul style="list-style-type: none"> · our use is unlawful and you oppose the erasure of the data; or · we no longer need the data, but you require it to establish a legal case.
<p>To object to our processing it</p>	<p>If we use the information about you on the basis of legitimate interest, you can object to our using it for those purposes, giving an explanation of your particular situation, and we will consider your objection.</p>

To withdraw your consent to our using it	This applies if the legal basis on which we use the information about you is consent. These cases will be clear from the context.
To challenge certain automated decisions	<p>If, as part of our recruitment process, we make a decision based solely on automated processing, and that decision produces legal effects concerning you or similarly significantly affects you (for example, you are not invited to interview on the basis of the decision), you have a right to contest the decision, to request us to have a human review of that decision, and to express your point of view.</p> <p>This right does not apply if:</p> <ul style="list-style-type: none"> (i) you gave your consent to the decision beforehand; (ii) that use of information about you is necessary for entering into; or the performance of, a contract between you and us; or (iii) it is authorized by law. <p>As mentioned above, these decisions will be drawn to your attention at the time, together with information about the logic involved in the decision, as well as the significance and the envisaged consequences for you of such use of information about you.</p>
To data portability	<p>If:</p> <ul style="list-style-type: none"> (i) you have provided data to us; and (ii) we use that data, by automated means, and on the basis either of your consent, or on the basis of discharging our contractual obligations to you, <p>then you have the right to receive the data back from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible for us to do so.</p>
To lodge a complaint with the supervisory	If you have any complaint, we welcome the opportunity to resolve it for you directly. Please consider contacting us

authority in your country

using the contact details linked at the start of this notice before contacting a supervisory authority.

If you do wish to contact a supervisory authority, details are as follows:

- For the European Economic Area, you can contact your local authority as listed on the Europa website via [this link](#). If you are unsure who your jurisdiction's supervisory authority is, please contact us using the details linked to at the top of this page.
- For the UK, you can contact the Information Commissioner's Office via this [link](#).
- For Switzerland, you can contact the Federal Data Protection and Information Commissioner via this [link](#).
- For other countries please consult the website of your country's authority.

If you are unsure who your jurisdiction's supervisory authority is, please contact us using the details linked to at the top of this page.

If you are in the United Kingdom

If you are in the United Kingdom, you may have rights in addition to those set out in this notice under UK data protection law. These include the right to obtain further information about how your personal data is used, accessed, or shared, and the safeguards that apply. You also have the right to raise concerns or make a complaint about how we handle your personal data using the contact details set out in our privacy notice. If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO).

Who should you contact with questions?

If you have any questions, or wish to exercise any of your rights, you can contact us:

- at privacy@fertin.com contact for Fertin affiliates;
- at pandc@aspeya.com for Aspeya affiliates.

If your country has a data protection authority, you have a right to contact it with any questions or concerns. If the company cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court.

Aspeya, Inc. affiliates

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Changes to this notice

We may update this notice (and any supplemental privacy notice), from time to time. Where the law requires it, we will notify you of the changes; further, where the law requires it, we will also obtain your consent to the changes.

Last modified: 16 June 2026.

You can find previous versions of this notice [here](#).