

## Privacy Notice for Candidates

This privacy notice („**Notice**“) provides you with information on how BirgiMefar part of Arcera („**Arcera**“ or “**we**”) uses or otherwise processes your personal data when you apply for an open position at Arcera or participate in hiring process. The hiring process includes selection procedures in view of potential recruitment as well as optional recruiting programs and events (“**Hiring Process**”).

Please read this Notice carefully. It explains when, why, and how we use your personal information during the hiring process. You will also learn about your rights regarding your personal data. We promise to handle and protect any information you share with us according to the law and Arcera’s privacy policy. The Arcera company that you applied to, or the one responsible for the process described in this notice, is in charge of your personal data.

### **BirgiMefar**

Address: Ramazanoglu Mah, Kurtköy, Ensar Cd. No : 20, 34906 Pendik/İstanbul, Türkiye

In all cases, you may contact Arcera privacy function by email: [privacy@arceralifesciences.com](mailto:privacy@arceralifesciences.com)

**What is personal data in the context of the Hiring Process?** Personal data means all kinds of information relating to an identified or identifiable natural person. This information can be directly connected to you, or they can result from circumstances. This includes information such as your name, address, telephone number, personal identification code and date of birth, but also data about your specific career, background, hobbies, and similar data.

**Which personal data do we use and collect from you for the Hiring Process?** Typically, we collect and process the following data about you during the hiring process. Sometimes, we might not need all of this information, or we may need some extra details depending on the role or situation. We only ask for what’s necessary to help us with the hiring process and to get to know you better as a candidate.

- Your contact details, and personal situation;
- Information included in your CV, cover letter or any document you may have shared with Arcera (e.g. reference). Please note that it is your responsibility to obtain consent from your referees or any

other person you mentioned in your documents prior to providing us with their personal information;

- Current and historic salary details together with salary expectations;
- Electronic identification and systems access data (e.g. picture or facial image, sound or video recording).

We only use sensitive personal data (like information about your health, ethnicity, or beliefs) if the law requires it or if a specific situation makes it necessary.

Arcera's staff involved in the Hiring Process may also take notes about the candidate to process and manage candidates and to facilitate any further communication needed.

During the Hiring Process we might ask you to participate in assessment days, complete tests, or occupational personality profile questionnaires, and/or to attend an interview. During these activities, you and/or Arcera may generate new information. For example, this newly generated information may result from you by completing a written test, or Arcera might take interview notes.

**What is the Conflict of Interest and which data do we collect for that purpose?**

Before making any official job offer, Arcera will ask a candidate who has reached the final stages of the hiring process or received a preliminary job offer to fill out a Conflict-of-Interest ("Col") declaration. This declaration helps us identify and address any situations where your personal relationships or interests might influence your responsibilities at Arcera, ensuring transparency and fairness in our hiring process and in our future collaboration.

The data we process for the purposes of Col:

- Your name, Your email address, Country,
- your documents submitted with your application (e.g. curriculum vitae, cover letter, reference letters),
- Name, job title, function, relationship and related Arcera entity if your family member is working for Arcera, a business partner of Arcera, or a government entity of relevance to Arcera,
- Any other personal information you may have disclosed in the declaration form.

For managing the Col declaration, or any Col identified risk, Arcera may also process personal data resulting from monitoring the transactions with your related parties.

Please refrain from disclosing sensitive personal data in any free text fields in the Col declaration form. If you believe that such data is relevant to declare your Col, please contact your contact person in our People & Culture department before submitting such information.

**What personal data we may get from other sources?** Arcera may publish job openings on occupational websites, find you based on information you communicate online, including via platforms (e.g. LinkedIn), or Arcera may find you via professional recruitment service providers. We call them Partners.

In the event you apply for an opening at Arcera through a Partner, it is important to note that the relevant Partner may keep your personal data and/or may collect data from Arcera in respect of the progress of your application. Partners usually process your personal data according to their own privacy notice.

We may also receive your personal data from a third party who recommends you or informs us of your eligibility as a candidate for a specific opening or for our business more generally.

Any use by a Partner of your data will be governed by:

- the Partner's Privacy Notice, and
- the terms and conditions between you and Partner, and
- the terms and conditions between Arcera and Partner.

**Do we use any automated system to process your personal data?** We do not use any automated decision making in recruitment. There is a human intermediary in each processing activity even if we use third party recruitment tools with certain automated features.

**How long do we keep your data?** We keep your recruitment data at least 12 months after the specific recruitment process is finished (normally 12 months after the position is filled).

We keep your CV up to 3 years only if you have provided us with your consent to be considered for a future opening.

**Do we share your personal data with anyone else?** Only selected employees of Arcera, such as management team members, potential future line managers or P&C staff, and selected Partner who support us with the recruitment process, have access to your personal data.

If you apply for a management position, Arcera may also share your personal data with our shareholder.

Except as set out in this Notice or as required by law, your personal data will not be transferred to any third party without your consent.

Globally, we may use a Partner, called Bamboo, to provide a recruiting software system to our Arcera People & Culture department. When needed for technical support and maintenance, employees of the third-party providing with Arcera with the Bamboo solution might have limited access to your data. Notes created by Arcera staff members about the candidate are so to process and manage candidates and to handle communication.

In case we need to request for a visa and as part of the dossier we need to provide the authorities with the list of candidates who have applied for the same position, including name, nationality, country of residence, work permit, highest education and reason for rejection.

**Do we transfer your personal data to any third countries?**

Arcera may transfer your personal data to other Arcera Group companies which may be established in third countries. This is only done when the Hiring Process covers multiple locations, or the nature of the role covers multiple locations. If you apply for a management position, Arcera may also transfer your personal data to our shareholder who is located in UAE. The intra-group personal data transfer is governed by an intra-company data transfer agreement that includes relevant standard contractual clauses to safeguard your data.

In addition, we may transfer your personal data to Partners who act as data processors and may operate the technical infrastructure that we need to host, store, manage and maintain the daily business. For the Hiring Process, Arcera may use different hiring services using HR Bamboo, LinkedIn or other recruitment software. The use of these hiring services are governed by adequate data processing agreements, standard contractual clauses, if necessary.

**Security measures**

Arcera has implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality to your personal data. The purpose of these measures is to protect your own personal data against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

**Your rights as a data subject**

You have the following rights under the data protection law, subject to the applicable statutory limitations:

- request access to information that Arcera holds about you;
- request a correction of information that Arcera has about you;
- request the erasure of information that Arcera has about you;
- restrict the use of your personal data;
- receive a copy of your personal data;
- object to the processing of your personal data;
- withdraw your consent for the use of your personal data;

- file a complaint about our processing with a supervisory authority.

Please contact us by email: [privacy@arceragroup.com](mailto:privacy@arceragroup.com) if you have any questions about how Arcera is processing your personal data.

**Modification of the Privacy Notice** Arcera may change or update the Notice from time to time by posting a new notice on our website.