PRIVACY POLICY FOR JOB APPLICANTS AND SUCCESSFUL CANDIDATES

United HealthCare Services, Inc., and its subsidiaries and affiliated companies (collectively, the “Company”) strives to properly address applicable data protection and privacy legal requirements.

The primary data controller in respect of your Candidate Data is the entity with which you are applying for employment. A list of EEA entities is available [online].

SCOPE

This Privacy Policy for Job Applicants and Successful Candidates' Data ("Privacy Policy") provides the individuals who apply for employment with and / or who have been offered employment by one of the Company’s subsidiaries and affiliates in the European Economic Area (EEA) ("Job Applicants" and "Successful Candidates" respectively) with certain important information about how the Company handles their personal data ("Candidate Data"). This Privacy Policy does not apply to job applicants or successful candidates located outside of the EEA.

TYPES OF CANDIDATE DATA COLLECTED

Candidate Data is provided by Job Applicants and Successful Candidates, and includes the following types of data:

- Name
- Date of Birth
- Address
- Email Address
- Telephone Number (landline and mobile)
- CV
- Employment history
- Education history
- Referee contacts
- National Insurance Number/ social security number
- Gender
- Nationality
- Place of Birth
- Marital Status

PURPOSE OF COLLECTION AND USES, LEGAL BASES, AND DISCLOSURES OF CANDIDATE DATA

The Company will only use and otherwise process Candidate Data:

- of Job Applicants for recruiting and job placement purposes including notification of future job opportunities; and
- of Successful Candidates for on-boarding purposes and background screening, including enrolment in payroll and applicable employee benefit schemes, preparation of
employment contract, and other administrative purposes necessary for the Successful Candidate to commence employment with the Company.

Company’s legal bases to use and process Candidate Data include that the processing is necessary for:

- the Company’s legitimate interests, including those described above, as processing Candidate Data is necessary to carry out the hiring process and to make it possible for Job Applicants and Successful Candidates to apply for and / or be appointed to a position at the Company;
- compliance with Company’s legal obligations, such as accounting and tax requirements;
- the performance of the employment contract between the Company and Successful Candidates;
- for the purposes of carrying out the obligations and exercising rights under employment law; and
- where applicable, Job Applicants or Successful Candidates, may subsequently withdraw at any time by contacting us via the information in the “Contact Information” section, without affecting the lawfulness of processing before its withdrawal.

As necessary, and in connection with these purposes, authorized processors, including, but not limited to, members of the Human Resources department, the Finance department, the IT department, Compliance and Ethics department, and senior executive Company managers may access and otherwise process Candidate Data in connection with their job responsibilities.

Some of these processors may be employed by the Company at our various global locations outside of the EEA, including in countries that may not provide the same level of data protection as the home country of the Job Applicant and Successful Candidate. The Company takes appropriate steps to ensure that such personnel are bound to duties of confidentiality with respect to Candidate Data, and the Company implements measures such as standard data protection clauses to ensure that any transferred Candidate Data remains protected and secure. You can obtain a copy of these clauses by contacting us via the information found in the “Contact Information” section. The use and transfer of Candidate Data are only for the purposes outlined in this policy and in accordance with applicable law.

USE OF CANDIDATE DATA FOR BACKGROUND CHECKS AND WHO WE COLLECT DATA FROM

Offers of employment with the Company, where permitted by local law, may be subject to and conditional upon the completion of certain background checks which are permitted by applicable employment laws including searches of the following databases:

- databases relating to serious and organised crimes, databases managed by regulatory and compliance authorities, web and media databases, and global sanctions and watch lists managed by financial regulatory bodies and law enforcement agencies);
- standard sanctions databases (UN, EU, U.S. lists, etc.) in compliance with economic sanctions laws throughout the world; and
for Employees who may work on government programs, including, but not limited to United States Federal or State government programs, United States Federal and/or State debarment or exclusion lists or other such lists required by law or contract.

Candidate Data provided by the Successful Candidate following an offer of employment may be used to facilitate the conduct of Background Checks. No Background Checks will be undertaken prior to an offer of employment being made.

Successful Candidates may be requested to provide information related to their family members who hold government positions in order for the Company to assess potential conflicts of interest. When providing this information, it is the responsibility of the Successful Candidate to obtain the family member’s permission to disclose such information to the Company.

Due to the nature of the Company’s business, it will carry out regular and ongoing screenings of the databases listed above during the course of employment to ensure that the Successful Candidate remains suitable for a position with the Company and are permitted without exception to provide services to all of the Company’s clients and in particular to organisations who prohibit excluded or debarred individuals from working on their account. Any offer of employment will be strictly conditional on passing these screenings during the course of employment. Further information in relation to these screenings may be found in the Company’s Employee Sanctions Screening Notice.

Conduct of the Background Checks may involve the collection of additional information about the Successful Candidate from educational institutions, government agencies, previous employers, credit reporting agencies, information in the public domain and law enforcement agencies at the international, national or local level so far as is permitted by applicable law. If a Successful Candidate’s prior employers and/or other referees are contacted, the report may include information obtained through personal interviews.

In so far as permitted under applicable local law, the information collected may include, but is not limited to, educational and professional achievement / qualifications, employment references, information freely available in the public domain, and criminal history records including enhanced disclosure where required by law for a particular position (the “Background Check Data”). If Job Applicants and Successful Candidates provide the Company with data of third parties (such as former employers, referees, etc.) it is the responsibility of Job Applicants and Successful Candidates to ensure that the communication of such data to the Company and further processing by the Company according to this Privacy Policy is lawful.

TRANSFER TO THIRD PARTIES

The Company uses third party vendors for certain services, including:

- the online recruitment portal in which Job Applicants enter and submit their application; and
- the conduct of the Background Checks described above.

When Company retains a third-party vendor, that vendor will be carefully selected and required to use appropriate measures to protect the confidentiality and security of personal data.
Some of these third parties are located outside the EEA, including in countries that may not provide the same level of data protection as your home country, such as the United States of America and India. To the extent required by applicable law, the Company will address any applicable requirement to assure an adequate level of data protection before transferring Candidate Data and Background Check Data by implementing measures such as standard data protection clauses to ensure that any transferred Candidate Data remains protected and secure. You can obtain a copy of such clauses by contacting us via the information found in the “Contact Us” section.

RETENTION OF CANDIDATE DATA AND BACKGROUND CHECK DATA

Candidate Data and Background Check Data will be retained only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws.

When a Successful Candidate enters employment with the Company, his or her Candidate Data and relevant Background Check Data may be transferred to an employee personnel file and may be processed and retained in accordance with applicable law or the Company's Data Protection Policy from time to time in force, a copy of which is available on the Company intranet.

DATA SECURITY AND DATA INTEGRITY

The Company maintains reasonable security measures to safeguard Candidate Data from loss, interference, misuse, unauthorized access, disclosure, alteration or destruction. The Company also maintains reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

RIGHTS

Job Applicants and Successful Candidates are entitled to request access to, rectification or erasure of their own Candidate Data or restriction of processing or to object to processing of their own Candidate Data and other rights in accordance with applicable law or Company policy. Requests should be submitted in writing (an email message is acceptable), to the Human Resources department using the information below in the “Contact Information” section.

If a Job Applicant or Successful Candidate is aware of changes or inaccuracies in his or her Candidate Data of which the Company is not aware, he / she should inform the local Human Resources department of such changes so that the Candidate Data may be updated or corrected.

Candidate Data from Job Applicants will be retained on file, to be used for future employment opportunities, subject to applicable law on retention of personal data. If at any point before a Job Applicant is offered employment they wish to have their application information removed from the recruitment database, the Job Applicant should send a written request to the local Human Resources department with the subject line "Please remove me from your Recruitment database". Notwithstanding such a request, certain information may be retained as required by applicable law.
Job Applicants and Successful Candidates may lodge a complaint with a supervisory authority if they consider that Company’s processing of their Candidate Data infringes applicable law.

DISCLOSURES REQUIRED OR PERMITTED BY LAW

Regardless of any other provisions in this Privacy Policy, the Company may disclose or otherwise process Candidate Data in the context of any sale or transaction involving all or a portion of the business, or as may be required or permitted by law or required for the purposes of any regulatory audit to which the Company may be subject from time to time.

CONTACT INFORMATION

Job Applicants and Successful Candidates can raise any issues regarding their Candidate Data with their local Human Resources department or our Data Protection Officer by contacting:

HRdirect
humanresourcesemea@uhc.com

Data Protection Officer
UHG_Privacy_Office@uhg.com

ACCEPTANCE TO PROCESSING

By entering “I accept”, you declare the following:

- I have read and understand how my Candidate Data and Background Check Data will be processed in accordance with the terms of this Privacy Policy.

- I hereby release and hold harmless the Company, and any person, firm, or entity that collects, processes, shares or discloses my Candidate Data and Background Check Data in accordance with this Privacy Policy from any claim or action, suit, litigation, proceeding, arbitration, investigation as well as from liability that might otherwise result from the collection, processing, sharing or disclosure of my Candidate Data and Background Check Data in accordance with the terms of this Privacy Policy.
E-Signature Page Language
By entering and submitting an eSignature, you declare the following:

- I hereby certify that all of the statements, information and answers I have provided are true and complete to the best of my knowledge, and confirm my understanding that if I have misrepresented any information in my application or in any accompanying document I submit in support of my application, or if I have omitted any material facts, the Company will not consider me for employment. If I become employed by the Company, and any misrepresentation, falsification or omission is discovered after I have begun employment, I understand that my employment with the Company may be subject to termination.

- I hereby confirm my understanding that, where permitted by applicable law, offers of employment with the Company may be conditional upon satisfactory Background Checks, and that if my Background Check results are unsatisfactory, the Company may revoke its offer of employment to me. If I have already commenced employment when the Background Check results become available, and those results are unsatisfactory, I understand that my employment with the Company may be terminated.