

## MedTech Europe AiSBL – Applicant Data Protection Notice

This Data Protection Notice aims to give job applicants of MedTech Europe AiSBL (“**MedTech**”) information on how their personal data (i.e., information which directly or indirectly identifies an applicant) are processed by MedTech when they apply for a role or vacancy with MedTech. For the purposes of European data protection laws, MedTech is the controller of applicants’ personal data.

**Data That May Be Collected.** MedTech may collect certain personal data with respect to applicants including, without limitation: (i) contact information (e.g., name, home and business address, phone numbers and email addresses); (ii) personal information (e.g., date of birth, nationality); (iii) employment and education history; and (iv) any other information which may be voluntarily disclosed by the applicant in the course of the application process.

**Use of Applicant Personal Data.** The processing of personal data by MedTech may be necessary in order for MedTech to fulfil its legal obligations and where it is in the legitimate interests of MedTech to consider an applicant for a role or vacancy in accordance with MedTech’s recruitment process. In the event MedTech makes an offer of employment and the applicant accepts, the applicant’s personal data will be processed by MedTech to the extent necessary for MedTech to fulfil its legal and contractual obligations and where it is in the legitimate interests of MedTech for the performance of the employment relationship. **Applicants have a right to object to processing of their personal data where that processing is carried out for MedTech’s legitimate interest.**

**Disclosure to Certain Third Parties.** MedTech may disclose certain personal data for the above purposes to the following recipients: (i) its service providers (e.g., external recruitment agencies, IT service providers) or (ii) as required or permitted by law, including to comply with a subpoena or similar legal process or government or law enforcement request, or when MedTech believes in good faith that disclosure is legally required or MedTech has a legitimate interest in making a disclosure, such as where necessary to protect MedTech’s rights and property.

**Rights of Applicants.** Under applicable European data protection laws, applicants have a right to (subject to a limited number of exceptions): (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data; (iii) ask for a copy of their personal data to be provided to them, or a third party, in a digital format; and (iv) withdraw their consent at any time. Applicants also have the right to lodge a complaint about the processing of their personal data with their local data protection authority.

**Security and Retention.** MedTech will take steps to protect applicants’ personal data against loss or theft, as well as from unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held. MedTech will retain applicant personal data for no longer than is necessary for the purposes for which MedTech is processing such personal data, as follows: (i) for

the duration of the application process; (ii) if the application was unsuccessful, after the notice of rejection, for as long as necessary in order to resolve any queries or disputes; or (iii) in case of a legal or regulatory obligation requiring us to retain specific records for a set period of time, for that period of time. MedTech may also wish to retain personal data in instances where an applicant is unsuccessful for a period of 12 months to assess the applicant for alternative positions where we have the applicant's consent to do so.

**Enquiries, Requests or Concerns.** All enquiries, requests or concerns regarding this Notice or relating to the processing of applicant personal data including all requests as detailed in the Rights of Applicants Section above, should be sent to [data.protection@medtecheurope.org](mailto:data.protection@medtecheurope.org).