



# Privacy Notice for Candidates (EU and UK Citizens)

## Introduction

Brewer Science is committed to protecting the privacy and security of your personal information. This Privacy Notice describes how Brewer Science (“the Company”) collects and uses personal information about you during the recruitment exercise in accordance with data protection legislations, specifically the European Union’s General Data Protection Regulation (GDPR) and the United Kingdom’s GDPR (UK GDPR). It applies to all employees who fall within the scope of the EU or UK GDPR.

GDPR and the UK GDPR defines ‘personal data’ as information relating to a natural person who is identified or identifiable, directly or indirectly, by reference to an identification number of one or more facts that are specific to him or her (last name, first name, address, data of birth, etc.) Your personal data is collected and processed by the Company in a good faith, legal, and transparent manner.

Brewer Science is a ‘data controller.’ This means we are responsible for deciding how we hold and use personal information about you. The Company is required under data protection legislation to notify you of the information contained in this Privacy Notice.

It is important that you read this notice to ensure you are aware of how and why your personal data will be used in the recruitment process as you apply for a position with the Company and the duration for which it will usually be retained. It provides you with certain information that must be provided under the GDPR and UK GDPR.

## 1. Data protection principles

Brewer Science will comply with data protection law, which states that the personal information we hold about you must be:

- Used lawfully, fairly, and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 1 of 10
-----------------------	---------------------------------	--------------------------------------------------------------------------------------	--------------------------------	-----------------



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Additionally, Brewer Science complies with the principles of the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce.

## 2. The kind of information we hold about you

In connection with your application to fill a position at Brewer Science, we will collect, store, and use the following categories of personal information about you:

- Information you provided to us in your curriculum vitae and cover letter
- Information you provided on our application form including name, title, address, telephone number, personal e-mail address, date of birth, gender, employment history, and qualifications
- Veteran status, disability status, and ethnicity/race information when applying for a position within our US locations
- Signature
- Fingerprint
- CCTV Images collected by our on-campus security system
- Dietary preferences
- Any information you provide to us during an interview, whether in person or via a conferencing system

We may also collect, store, and use the following ‘special categories’ of more sensitive personal information if provided to Brewer Science during the recruitment process with your consent:

- Information about your race and ethnicity or religious beliefs
- Information about your health, specifically any medical condition
- Whether you have been convicted of a felony

## 3. How your personal information is collected

We collect personal information about candidates from one or more of the following sources:

- You, the candidate
- HireRight, our background check provider, from which we collect the following categories of data: education verification, work history
- HireRight, our credit reference agency, from which we collect the following categories of data: personal credit
- Disclosure and Barring Service in respect of criminal convictions and HireRight, our criminal background check provider

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 2 of 10
-----------------------	------------------------------------	--------------------------------------------------------------------------------------	-----------------------------------	-----------------



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- Tomo Drug Testing, our employee drug and alcohol screening service, for DOT compliance
- If applying for an immigrant visa as part of your employment, we use Envoy Global and Jackson Lewis to process employee visas
- Your named referral sources or references, from whom we collect the following categories of data: clarification of employment, position held, dates of employment, and reason for departure
- Personal data that is sourced from a publicly accessible third party, e.g., LinkedIn and Indeed.
- On rare occasions, Brewer Science will partner with a recruitment agency, from which we collect any personal data you have made available to them

#### 4. How we will use information about you

We will use the personal information we collect about you during the recruitment process to:

- Assess your skills, qualifications, and suitability for the position
- Carry out background and reference checks, where applicable
- Communicate with you about the recruitment process
- Keep records related to our hiring and retention processes
- Comply with legal or regulatory requirements
- Facilitate any travel to allow you to visit our facilities for the recruitment process

When we receive your CV or resume, application form, and cover letter (if applicable), we will then process that information to decide whether you meet the basic requirements to be short-listed for the role. It is in our legitimate interest to decide whether to consider you for the position by deciding whether your application is strong enough to move to the next stage of the recruitment process, i.e., phone or on-site interview. If we decide to invite you for an interview, we will use the information you provide to us at the interview stage of the process to decide whether to offer you the position. If we decide to offer you the position, we will then take up references and/or carry out a criminal record and/or carry out drug screening before confirming your appointment. The requirements for checking references, carrying out criminal records, and drug screening are specific to hiring location and position being filled.

#### 5. If you fail to provide personal information

If you fail to provide information when requested that is necessary for us to consider your application such as evidence of qualifications or work history, we will not be able to process

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 3 of 10
-----------------------	---------------------------------	--------------------------------------------------------------------------------------	--------------------------------	-----------------



your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## 6. How we use particularly sensitive personal information

If provided to Brewer Science through the application process, we will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example, whether adjustments need to be made during an interview.
- We will use information about your race and national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.

## 7. Information about criminal convictions

When recruiting for a position in our US operations we envisage that we will process information about criminal convictions.

If we would like to offer you the position, we will collect information about your criminal convictions history on the condition that checks and any other conditions, such as references, are satisfactory. We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history that makes you unsuitable for the role.

## 8. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## 9. Data sharing

### Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- PayCor, the online tool we use for our recruitment process
- HireRight, our background check provider and our credit reference agency who assist us in the recruitment process.
- Disclosure & Barring Service and other applicable background checking services who provide their services for recruitment outside of the US.
- Travel, lodging, and immigration partners that allow us to facilitate your travel needs

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 4 of 10
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All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Brewer Science is a global organization, and we have offices and operations in a number of international locations; therefore, we share personal data between the Brewer Science organization for business and administrative reasons only and between internal employees for the purpose it was provided (i.e. for legitimate business interests).

Brewer Science is liable under the EU-U.S. Data Privacy Framework and the UK Extension if its third parties process personal information in a manner inconsistent with the DPF Principles.

## 10. Data security

Brewer Science has put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and keep it secure.

Brewer Science has put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. To request details of these measures, please contact the GDPR team at [privacy@brewerscience.com](mailto:privacy@brewerscience.com).

Brewer Science has put in place procedures to deal with any suspected data security breach and will notify you and any applicable supervisory authority of a suspected breach where we are legally required to do so.

### EU-US Data Privacy Framework and UK Extension Compliance – Protecting your personal information when transferring it outside the European Economic Area (EEA) or the UK

Brewer Science will transfer the personal information we collect about you to the United States of America and within the EU or UK in order to perform our contract with you. There is an adequacy level of protection in EU countries and the UK. This means the EU or UK countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

When transferring data from the EU or UK to the United States of America,

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 5 of 10
-----------------------	---------------------------------	--------------------------------------------------------------------------------------	--------------------------------	-----------------



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Brewer Science complies with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce. Brewer Science has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, Brewer Science commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner’s Office (ICO) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF in the context of the employment relationship.

In compliance with the Data Privacy Principles, Brewer Science commits to resolve complaints about our collection or use of your personal information. EU or UK individuals with inquiries or complaints regarding our Data Privacy policy should first contact the Privacy Champion, Kris Bieker, at:

**E-mail:** [privacy@brewerscience.com](mailto:privacy@brewerscience.com)

**Tel:** 1-(573) 364-0444 ex: 1955

**Address:**

2401 Brewer Drive  
Rolla, MO 65401

Or our local UK contact, Vicki Hallsworth.

**Tel:** +44 (0)1332 545888

**Address:**

North Mill, 2nd Floor  
Darley Abbey Mills  
Derby, DE22 1DZ  
England

Brewer Science has further committed to cooperate with the panel established by the EU and the UK data protection authorities with regard to unresolved Data Privacy Framework complaints concerning human resources data transferred from the EU or UK in the context of the employment relationship.

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 6 of 10
-----------------------	---------------------------------	--------------------------------------------------------------------------------------	--------------------------------	-----------------



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Additionally, Brewer Science has committed to refer unresolved DPF Principles–related complaints to a U.S.-based independent dispute resolution mechanism, BBB NATIONAL PROGRAMS. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbbprograms.org/dpf-complaints](http://www.bbbprograms.org/dpf-complaints) for more information and to file a complaint. This service is provided free of charge to you.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before an EU-U.S. Data Privacy Framework Panel.

Brewer Science will also be subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

## 11. Data retention

### How long will you use my information?

Brewer Science will retain your personal information as local legislation requires and defines after we have communicated to you our decision about whether to appoint you to the role.

We retain your personal information for that period so we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file on the basis that a further opportunity may arise in the future and we may wish to consider you for that, we will write to you separately seeking your explicit consent to retain your personal information for a fixed period on that basis.

## 12. Rights of access, correction, erasure, and restriction

### Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"); this enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information we hold about you; this enables you to have any incomplete or inaccurate information we hold about you corrected.

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 7 of 10
-----------------------	------------------------------------	--------------------------------------------------------------------------------------	-----------------------------------	-----------------



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- **Request erasure** of your personal information; this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground; you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information; this enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information; object to the processing of your personal data; or request that we transfer a copy of your personal information to another party, please contact the GDPR Champion directly in writing at [privacy@brewerscience.com](mailto:privacy@brewerscience.com).

### 13. Right to withdraw consent

When you apply for a position at Brewer Science, you are providing your consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our GDPR Champion at [privacy@brewerscience.com](mailto:privacy@brewerscience.com) for guidance on how to do this. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### 14. Privacy Champion

Brewer Science has appointed a Privacy Champion to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact your Privacy Champion, Kris Bieker.

**E-mail:** [privacy@brewerscience.com](mailto:privacy@brewerscience.com)

**Tel:** 1-(573) 364-0444 ex: 1955

**Address:**

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 8 of 10
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2401 Brewer Drive  
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Or our local UK contact, Vicki Hallsworth.

**Tel:** +44 (0)1332 545888

**Address:**

North Mill, 2nd Floor  
Darley Abbey Mills  
Derby, DE22 1DZ  
England

Brewer Science does have a complaint process and would like the opportunity to address any complaint you have with regard to your personal data, but you do have the right to make a complaint at any time to your country's supervisory authority for data protection issues.

EU Data Protection Authority: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

UK Data Protection Authority: <https://ico.org.uk/make-a-complaint>

Last Revised By KB	Issue/Revision No. M737127/D	Brewer Science PROPRIETARY FOR INTERNAL USE ONLY Uncontrolled if printed	Document Owner Rebecca Rich	Page 9 of 10
-----------------------	---------------------------------	--------------------------------------------------------------------------------------	--------------------------------	-----------------