



Candidate Privacy Notice

May 2024

This privacy notice applies to job applicants, recruitment candidates and/or individuals joining S+N's Talent Community or participating in career events.

At Smith+Nephew we care about your privacy and understand that trust is paramount when handling your personal information. We want you to feel reassured that we treat your personal data with appropriate due diligence and care, and we endeavour to explain how we do that in this document. This privacy notice explains our practices relating to the processing of personal information during application, recruitment, pre-employment screening and onboarding, as well as for future career opportunities.

When we refer to 'Smith+Nephew', 'S+N', 'we', 'us' and 'our' we are referring to the Smith+Nephew group of companies.

'Personal information' or 'personal data' means any information or piece of information which could identify you either directly (e.g. your name) or indirectly (e.g. a unique ID number).

If there are stricter local laws that apply to how we manage your personal data, those standards will apply. Where applicable local laws give you additional rights in respect of your personal information, we will apply those additional rights.

1. Who is the responsible entity for your personal information?

The Smith+Nephew company to which you are applying is the entity responsible for your personal information. In the case of S+N's Talent Community, the entity responsible for your personal information is the Smith+Nephew company located in the country where you live.

2. Contact information and your privacy point of contact

If you want to exercise your rights in connection with your personal information (see Section 12 'What are your rights regarding your personal information'), have any questions about this privacy notice, need more information or would like to raise a concern, please contact privacyenquiries@smith-nephew.com or contact us via our Speak Up Line [here](#).

3. What personal information or categories of information do we collect about you?

Application and recruitment

The personal information we collect and process as part of the job application and related recruitment process may include, but is not limited to the following:

- a. **Basic information** such as your name (including prefix or title), age or date of birth;
- b. **Contact information** that allows us to contact you such as your personal or business email, mailing address, telephone number, and profile on a professional social media platform;
- c. **Application details** such as your CV/résumé, cover letter, preferences, interests etc.;
- d. **Education** which includes any information related to your education, including level, type, grades, subject matter, degrees, diplomas, certificates and related institutions;
- e. **Professional experience** which includes any information related to your work experience, references, and referees;
- f. **Certifications** which includes any information related to professional and other work-related licenses, permits and certifications held by you;
- g. **Visa/Work permit status** i.e. at the application stage we may request you to confirm whether you are legally permitted to work in the country we are recruiting in;
- h. **Skills** which includes any information related to your knowledge, skills, languages, and other competencies;
- i. **Online account information** such as username and password, candidate and application identifiers etc. when you create your candidate profile or submit your application on S+N's career portal;
- j. **Interview information** such as comments noted by our interviewers and audio/video recordings of the interview (in case of telephone interviews or video-enabled interviews);
- k. **Applicant assessments** such as responses to case studies, assessment questionnaires etc.;
- l. **Diversity information** such as information related to your gender, race/ethnic origin, disability or veteran status (if permitted by law) that you may provide at the application stage. We collect this information for the purpose of monitoring equal employment opportunity (see also separate section on Special categories of personal data);
- m. **Bank account details** we may be collect if we need to reimburse you for travel expenses incurred during the recruitment process;
- n. **Other information** you otherwise elect to provide to us (e.g. employment preferences, willingness to relocate, current salary, desired salary, awards or professional memberships);
- o. **Communication preferences** such as preferred communication method and language;
- p. **Photographs or videos** obtained during our career events (if applicable);
- q. **Publicly available information** that you may publish online (e.g. on LinkedIn).

Pre-employment screening and onboarding

If we make you a job offer the following additional information may be collected as part of the pre-employment screening and onboarding process:

- a. **National identifiers** such as national ID/passport, residency and work permit, social security number, or other taxpayer/government identification number;
- b. **Financial information** such as your salary, retirement account information, company allowances, bonus, benefits, working time records, and taxpayer reference number (e.g. Tax Identification Number, National Insurance number, Social Security Number);

- c. Dependents' information** such as information related to your dependents, e.g. the first and last names, dates of birth, and contact details of your spouse/partner and dependents (if applicable);
- d. Background information** such as education and academic as well as professional qualifications. If we want to offer you the job, we may need to complete pre-employment screening. We may then also collect additional background information such as without limitation credit history, criminal records and occupational health information (if permitted by law).

Special categories of personal data

As part of the overall engagement with you we may process special categories of personal data such as information related to your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, veteran status or information about your health, disabilities, or sexual orientation. We use this information to make sure we comply with relevant laws. We will also use this information to discuss with you what reasonable adjustments we can make for you. We furthermore want to make sure that we provide an inclusive workplace. If we offer you employment, we may ask you for information about your health (physical or mental) so that where applicable we can arrange health and insurance benefits to you and your dependents.

You can decide whether to give us special categories of personal data, if we ask for them at the application stage. If you decide not to share these with us, please be assured this does not affect your application, unless we are legally required to collect such information and are unable to proceed with your application without it.

You can also choose not to give us the other types of personal information when we ask you for them. If you decide not to give us your personal information, we may not be able to assess or consider your application.

If you give us the personal information of another person, e.g. your spouse/partner or referees, we assume you have their permission to share their data with us.

We will not process personal information (including any of the information listed above) if the law of your country prohibits us from doing so.

You are responsible for providing information that is accurate, complete and up to date when you apply for a position at S+N.

4. How do we use your personal information?

We may process your personal information for the following purposes:

a. To consider your application

For example, we will use your personal information to:

- Reply to your application. If someone else referred you to us or we obtained your information from other sources, we will use your personal information to contact you and let you know about our recruitment process;
- Create a profile of you;
- Assess how suitable your profile is for the job you are applying for;
- Evaluate all our candidates and create a shortlist; and
- Conduct interviews and assessments during the recruitment process.

b. For pre-employment screening, if we decide to offer you employment

For example, we will use your personal information to:

- Contact referees mentioned in your application to check the suitability of your application;
- Check your background, references and other information you gave us, to the extent allowed by law; and
- Prepare an offer of employment and other documents we use at this pre-contract stage of our recruitment process.

c. To enable your participation in S+N's talent community

For example, we may use your personal information to:

- Create a candidate profile of you in S+N's Talent Community;
- Consider you for job opportunities we have now, or future ones, in any of the S+N group of companies. This means we may share your information with other S+N entities;
- To let you know about job opportunities or to ask you to update your profile;
- To invite you to and manage your participation in career events (both online and physical); and
- To provide you with updates relating to Smith+Nephew.

d. To manage and improve our recruitment processes as well as our business operations related to the recruitment and onboarding process

For example, we may use your personal information to:

- Manage our network and information systems security;
- Keep records related to our hiring processes;
- Measure the recruitment process against our aspirations to ensure we are adhering to fair employment practices;
- Prepare and perform management reporting and analysis, including analytics and metrics, related to the recruitment process; and
- Improve our applicant selection process and related applicant selection systems.

e. To achieve other purposes

For example, we will use your personal information:

- To comply with applicable laws and regulations;
- To respond to requests from competent public authorities;
- To tell you about changes to our terms, conditions and policies;
- To exercise or defend S+N against potential, threatened or actual litigation;
- To protect S+N, your vital interests, or those of another person;
- To provide work related accommodations or health and insurance benefits to you and to your dependents;
- To evaluate S+N's progress in achieving its diversity hiring goals to ensure equal opportunity monitoring and reporting, including to comply with related applicable laws and regulations.
- To respond to and handle your queries or requests; and
- When we sell, assign or transfer all or part of our business.

5. How do we collect your personal information?

Examples of how we collect your data include:

a. Directly from you when you:

- Create an account and profile on S+N's careers portal or join our S+N Talent Community;
- Share or use your social media profile to access the S+N's careers portal;
- Sign up with us to receive open job postings;
- Share your résumé/CV with us;
- Take part in meetings, career events, physical or virtual interviews, other recruitment exercises (e.g. assessments);
- Information may also be requested and provided in our correspondence with you (e.g. via email, phone or video call, SMS messaging etc.).

b. From other sources:

- Recruitment agencies;
- Companies who do pre-employment screening for us;
- Former employers and references you provide in your application;
- Your current/former colleagues and/or managers when they give us your reference; and
- Organisers of career events in which S+N participates.

c. From public sources:

- We collect your personal information from public sources, if allowed by law. We may use such a source e.g. to verify your licenses, or complete any checks we need to do in order to meet relevant laws; and
- We may collect and process career information you have published on professional sites (e.g. LinkedIn) for the purpose of contacting you about open/future opportunities.

6. Why are we allowed to collect and use your personal information?

We can collect and use your personal information when one of the following applies:

- To take steps before entering an employment contract or to perform an employment contract;
- To follow the law, for example, employment, social security and occupational health laws and regulations;
- You have specifically given us your permission when such permission is obligatory (the law calls it "consent"). You can withdraw your consent at any time;
- It is in our interest in considering you as a candidate for current and future employment opportunities (the law calls it "legitimate interest"); and
- To protect your vital interests or those of others.

7. Information about the use of automated processing

We use automated tools to assist S+N's recruiting team in the initial stages of processing and evaluating job applications. For example, we may leverage algorithms to help us prioritize the application review process and sort candidates on the basis of professional characteristics or qualifications. Such processing may include the following without limitation:

- Compare the information you supply with your application with the specific requirements and qualifications of the target role(s);
- Provide a comprehensive overview to the S+N's recruiting team of your application details against the requirements of the job posting;
- Assign a ranking to your application based on the above. These rankings are visible to the S+N recruiting team as one of several factors to consider in the selection process. All final decisions are made by S+N's recruiting and hiring team(s).

8. With whom do we share your personal information?

We share your personal information on a need-to-know basis, and to the extent necessary to follow laws and regulations, and to manage and run the activities related to the recruitment process and other related business processes.

We may share your personal information with teams in the Smith+Nephew group of companies who need the information in order to perform activities relating to their role.

We may also share your personal information with other third parties, for example:

- Event and travel agencies;
- Specialised service providers who perform recruitment and pre-employment screening activities;
- Technology suppliers who provide, manage and/or support S+N's systems and portals;
- Partners who assist us in the management of our recruitment activities;

- Regulators, courts, governments and law enforcement authorities;
- Professional advisors, such as auditors, accountants and lawyers; and
- Potential counterparties in the context of corporate merger, acquisition or disposal transactions, provided that any such recipients are subject to confidentiality obligations.

We will only provide third parties with the data necessary to fulfil the purposes outlined in this privacy notice. Furthermore, third parties with whom S+N has a direct contractual relationship will generally be required to maintain the confidentiality of your personal information and to comply with appropriate privacy and security standards and prohibited from using that information for any other purpose.

9. In what instances do we transfer your personal information outside of your home country?

Because of the international nature of our business, we may transfer your personal information within the Smith+Nephew group of companies or to third parties located outside of your jurisdiction. Such countries may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Additional information if you are in the European Economic Area (EEA), UK or Switzerland

Competent authorities in the EEA, UK and Switzerland recognise that data protection laws in certain countries outside those jurisdictions provide a similar level of data protection standards. Where we transfer your personal information to countries not recognised by those authorities, we have procedures in place to ensure your personal information receives the same protection as if it were being processed in the EEA, UK or Switzerland. For example, our contracts with third parties who would have access to your personal information stipulate the standards they must follow in respect of your personal information.

Any transfer of your personal information will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

10. How long do we keep your personal information?

In some jurisdictions, we are legally required to keep your personal information for a certain period. The duration depends on the specific legal requirements of the relevant jurisdiction. Otherwise, we will only keep your personal information for as long as is necessary for the purpose for which it was collected.

At the end of the retention period, your personal information will either be deleted completely or deidentified, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

If we offer you employment, and you decide to accept, the information that we collect during the application process may become part of your personnel file and other human resources systems and used to administer the employment relationship and for related reporting and recordkeeping purposes. In such case, the Employee Privacy Notice will be applicable to the processing of your personal data.

11. How do we protect your personal information?

We treat your personal information with care and in accordance with our policies and procedures, and take appropriate steps to protect it.

We use a variety of security measures and technologies to help protect your personal information and regularly monitor these for possible vulnerabilities and attacks.

We carefully choose service providers to work with, and check they have security measures and technologies in place to protect your personal information.

We do not sell your personal information.

12. What are your rights regarding your personal information?

Local privacy laws may give you rights with respect to your personal information, as described in more detail below. You may exercise your rights by contacting us (see Section 2 'Contact information and your privacy point of contact').

We will handle any request to exercise your rights in accordance with applicable law, but please note that these rights only arise in certain circumstances and may not be absolute. Depending on our reason for processing your personal information and to the extent the local law in your jurisdiction grants the applicable rights to you, you may be entitled to:

- Withdraw your consent to us processing your personal information;
- Ask us about the processing of your personal information including to be provided with copies of your personal information;
- Ask us to correct information you think is inaccurate or incomplete;.
- Ask us to delete your personal information;
- Ask us to restrict the processing of your personal information;
- Object to our processing of your personal information;
- Ask that we transfer personal information you have given us from one organisation to another, or to give it to you;
- Not be discriminated against for exercising your individual rights regarding your personal data;

- Appeal the response received related to your rights request where you deem it inadequate or insufficient; and
- Complain to your local data protection authority, including for example where relevant your State's Attorney General.

For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do.

Where we have relied upon your consent to use your personal information, and you later withdraw that consent, we may not be able to complete some of the activities described in 'How do we use your personal information'. Please also note that under certain local laws and applicable regulations, there are circumstances when any right to withdraw your consent will not apply.

13. Cookies, Website and Application Data; Use for Analytics and Marketing

Our websites may use cookies and similar technologies. You can choose to accept or decline cookies. If you choose to decline cookies, not all elements of our websites, apps and services may function as intended, so your experience may be affected.

To the extent that your local laws consider the information collected by cookies and other technologies as personal information, we will treat that information to the standards set out in this privacy notice.

For more information on our use of cookies, please refer to our [Cookie Policy](#). This policy explains what cookies and similar technologies are, and how we use them.

We collect information about your computer browser type and operating system, websites you visited before and after visiting our websites, standard server log information, Internet Protocol (IP) addresses, location data, mobile phone service provider, and mobile phone operating system. We use this information to understand how our visitors use our websites and mobile applications so that we can improve them, the services we offer, and our advertising. We may also share this information with other companies within the Smith+Nephew group of companies and with other third parties.

Some of our websites use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to analyse use patterns and may collect information about your use of the website, including your IP address. More information on Google Analytics can be found [here](#). If you would like to opt-out of having your data used by Google Analytics, you can opt out [here](#).