



Privacy Notice for Candidates

Aetna Global Benefits (UK) Limited Aetna Health Insurance Company of Europe DAC (Ireland)

WHAT IS THE PURPOSE OF THIS DOCUMENT?

Aetna Global Benefits (UK) Limited and Aetna Health Insurance Company of Europe DAC (Ireland) ('we', 'us') are both a "data controller" in relation to personal data they respectively collect and use for recruitment purposes. This means that we are responsible for deciding how we hold and use personal information about you. You are being provided a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor).

DATA PROTECTION PRINCIPLES

We will comply with all applicable data protection laws meaning that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid 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.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

In connection with your application for work with us we will collect, store, and use the following categories of personal information about you:

- information you have provided to us in your curriculum vitae and covering letter (where applicable).
- information you have provided on our application form/online recruitment platform, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary history.
- information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity. Such information is collected for equalities monitoring and will be anonymized. You do not have to supply this information.
- If an offer of employment is made and accepted, information about any criminal convictions and offences will be collected as part of the standard background check process.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Any relevant recruitment agency, where your application details have been sent to us from an agency.
- HireRight LLC background check provider, from which we collect the following categories of data: references, criminal record checks and employment history. This information is only collected and provided upon acceptance of an offer of employment.

HOW WE WILL USE INFORMATION ABOUT YOU

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

- Assess your skills, qualifications, and suitability for the work.
- Carry out background and reference checks (where applicable).
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with any legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to the specific role or work since it would be beneficial to our business to appoint someone to the vacancy.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your application details, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to offer you the role, we may then take up references, carry out a criminal record or carry out other check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

HOW WE USE SENSITIVE PERSONAL INFORMATION

We will use your sensitive personal information in the following ways:

- information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.
- information about your race or national or ethnic origin to ensure meaningful equal opportunity monitoring and reporting.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We will only process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you work which is conditional on checks and any other conditions, such as references, being satisfactory. We are entitled to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the Financial Conduct Authority and Prudential Regulation Authority to carry out criminal record checks for those carrying out work with us in certain roles.

AUTOMATED DECISION-MAKING

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

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: HireRight LLC for the purposes of background checks.

DATA SECURITY

We have 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.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

How long will you use my information for?

We will retain your personal information for a period of three months after we have communicated to you our decision about whether to appoint you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that 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 or any applicable laws and regulations.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in 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.

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. This enables you to receive a copy of the personal information we hold about you.
- **Request correction** of the personal information that we hold about you.
- **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.
- **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 which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you.
- **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 dpo@aetna.com, or Data Protection Officer, 50 Cannon Street, London EC4N 6JJ in writing.

DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) 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 the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Last updated: May 24, 2018.