



## **Job Applicant Data Privacy Notice**

Thank you for your interest in submitting an employment application to Cook. We appreciate your interest and trust in us. We want you to know how your Personal Data (defined as any data that can directly or indirectly lead to the identification of a specific individual) will be collected, evaluated and shared if you submit an employment application to us through our recruitment database. The relevant Cook entity to which you are applying is a “data controller” and will be responsible for deciding how we hold and use your Personal Data.

### **Data Collection**

If you apply for a position with us, we require certain information, including your name, contact information, employment history, education information, work skills, salary expectations, licensure and certifications (if applicable), and where you would like to work. We also collect any other information you have provided in your CV, covering letter, application form, or during an interview (if applicable). Cook limits the Personal Data that it collects to that which is relevant and proportionate for the intended purpose. Where necessary and permitted or required by law, we may collect Personal Data deemed sensitive under applicable law (for example, ethnicity, fitness to work or criminal convictions information). Cook collects Personal Data directly from you and, depending on the circumstances and the type of role applied for, we may also collect Personal Data about you from recruitment agencies, background check providers, your named referees and occupational health providers.

In some countries, it is customary to include other Personal Data on job applications, such as family status, interests, and professional associations. However, we do not require that information for the purpose of evaluating your employment application with us.

### **Data Processing**

We use your Personal Data to assess your skills, qualifications, and suitability for the role to which you have applied, carry out background and reference checks (where applicable and in compliance with local law), communicate with you about the recruitment process, keep records related to our hiring processes, and comply with legal or regulatory requirements. 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. Generally, we would only process sensitive Personal Data to ensure meaningful equal opportunity monitoring and reporting or, for information about your fitness to work status, and to consider whether we need to provide any appropriate adjustments during the recruitment process. If credentialing and/or a criminal background check is required for the position you have applied for, these are carried out by a third-party provider and Cook takes all reasonable steps to ensure appropriate safeguards are in place as required by applicable law in relation to any such processing.

Our grounds for processing the Personal Data above include where it is in Cook’s legitimate interests to review and assess the Personal Data provided by you to decide whether to appoint you to the role you have applied for. We also have a legitimate interest in ensuring the reliability, capability and integrity of our personnel. We also need to process your Personal Data to decide whether to enter into an employment contract with you and where you are successful, to perform such contract. In the rare instances where we process your sensitive Personal Data (as set out above), we rely on the public interest in diversity monitoring, our employment law obligations and where specifically notified to you or as required in certain jurisdictions, your affirmative consent.

### **Information Shared**

Your Personal Data may be shared with limited and relevant personnel within the Cook Group of companies, as warranted for processing and evaluating your application. It may also be shared with business partners who may be working with Cook for purposes of assisting with our job applicant database and surrounding recruitment activities, for example, any provider we use to assess your fitness to work (if applicable) or other

background check provider. On rare occasions, we may also be required by law or for compliance reasons to share employment applicant information with regulatory authorities. Your information will not be shared with any business partners or other third-parties for their own separate use, apart from evaluating your employment with Cook.

In addition, if you supply references to support your employment application, we may contact those individuals (including previous employers) to help us evaluate you for employment opportunities and to confirm your academic and professional record. Doing so will necessarily involve a limited disclosure of your Personal Data to those individuals or organizations, such as your name, the fact that you have submitted an application for employment to Cook, and the fact that you are interested in a certain type of employment position.

If your application is successful and you become an employee of Cook, the Personal Data that you provide as part of your application will be transferred to your employment file. In addition, we will need to make certain disclosures to regulatory and tax authorities, as well as to others at the company to assist us with onboarding. Please note that for certain positions and in certain countries, we also conduct background checks of personnel, and this may include the use of some of the information that you provided in connection with your job application.

### **International Data Transfers**

As a global organization, Cook stores data in secure, centralized systems and uses service providers based globally. Accordingly, Personal Data may be stored in, or accessible to authorized, limited persons located in the U.S. and/or countries other than your country of residence. In accordance with applicable data protection laws, Cook has put in place appropriate measures to ensure an adequate level of protection for Personal Data and applies those measures irrespective of where the data is processed or stored.

When we transfer Personal Data out of the European Economic Area (EEA) or the UK, we ensure an adequate level of protection by implementing one of the following safeguards:

- Only transferring the Personal Data to a country or territory deemed to provide an adequate level of data protection by the European Commission and/or the UK supervisory authority; and/or
- By using specific data transfer contracts approved by the European Commission and/or the UK supervisory authority which give Personal Data the equivalent protection it has in Europe, i.e., Standard Contractual Clauses.

When we transfer Personal Data out of other regions, Cook complies with the applicable regulatory requirements of cross-border transfer in that region.

In addition, certain Cook Group companies have certified to and comply with one or all of the following data privacy frameworks, as set forth by the US Department of Commerce i.e. EU-US Data Privacy Framework, UK Extension to the EU-US Data Privacy Framework and Swiss-US Data Privacy Framework. For more information on these data privacy frameworks or to view our certifications, please visit

<https://www.dataprivacyframework.gov/s/>.

### **Data Security**

Cook has put in place appropriate technical and organizational security measures to prevent unauthorized or unlawful disclosure or access to, or accidental or unlawful loss, destruction, alteration or damage to the Personal Data that it collects. These measures are intended to ensure an appropriate level of security in relation to the risks inherent to the processing and the nature of the data to be protected and are applied in a manner consistent with applicable laws and regulations. Cook evaluates these measures on a continuing basis to help minimize risks from new security threats as they become known.

### **Individual Rights**

Depending on your place of residence and subject to certain exemptions, you have the right to access your Personal Data maintained by Cook, to request correction of any inaccuracies, and any other rights granted

by applicable law. You may also ask us to delete your application or profile, if you no longer want to be considered for a position at Cook. If so, we will remove your information from the system in accordance with applicable data protection laws and retention requirements.

We invite you to return to our job applicant website at any time to access and review your information, update it, or inform us about other qualifications that you would like us to consider.

To exercise your individual rights in accordance with applicable data privacy laws, you must contact Cook using the information set out below. We have appointed a European data protection officer (DPO) to oversee compliance with this privacy notice and any questions about this privacy notice or how we handle your Personal Data, can be sent to the European DPO using the information below. You also have the right to make a complaint at any time to your supervisory authority for data protection issues, although we welcome the opportunity to address your concerns in the first instance.

### **Retention**

Cook retains Personal Data consistent with applicable laws and regulations as well as in order to meet our reasonable business needs. Cook disposes of Personal Data when it is no longer relevant and, in any case, upon expiration of the maximum storage term as set forth by applicable law or in line with our business need, unless the Personal Data is required for a longer period, such as in the case of a claim, lawsuit, or other regulatory investigation.

When assessing the data retention period, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the Personal Data, the purposes for which we process the Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Applicants who are recruited for interviews, or who receive employment positions with Cook will likely have their information stored for longer periods than unsuccessful candidates, consistent with employment needs and local laws and as set out in any applicable Cook employee privacy notice.

### **Changes to this Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your Personal Data.

### **Contact Us**

If you have any questions about the privacy of your information, would like additional information about your Personal Data on file with us, please contact Cook's Chief Privacy Officer at: Chief Privacy Officer, Cook Group Incorporated, P0 Box 1608, Bloomington, Indiana, USA, 47402 or at [Privacy@CookGroup.com](mailto:Privacy@CookGroup.com).

For applicants located in the EU/UK/EMEA, please contact Cook's European DPO at: Cook Ireland Ltd., Attn: European Data Protection Officer, O'Halloran Road, National Technological Park, Castletroy, Limerick, Ireland or at [DataProtectionEurope@CookMedical.com](mailto:DataProtectionEurope@CookMedical.com).

### **Working at Cook**

Cook is an Equal Opportunity Employer who takes pride in a diverse employment environment. We do not discriminate in recruitment, hiring, training, promotion or other employment practices. For more information about Cook Group, please visit our website at [www.cookgroup.com](http://www.cookgroup.com).

We invite you to check our job postings on an ongoing basis. Thank you again for your interest in working with us.