Candidate Privacy Notice

This notice describes how Swedish Orphan Biovitrum AB (publ) ("Sobi", "We" or "Our"), the controller, collects and uses personal information about you in connection with your application for a position at Sobi or any of its affiliates, in accordance with applicable data protection laws and our internal privacy policies and procedures.

What information we hold about you?
We will process the following personal information about you:

- your name, address and contact details, including email address and telephone number
- details of your qualifications, experience and employment history
- URL to your LinkedIn account
- for North American applicants, we collect data on ethnicity, gender, veteran status and disability status to be in line with local legislation and reporting to the local government
- information about your entitlement to work in the country in which the position you are applying for is located

How is your personal information collected?
We collect personal information about candidates from:

- You, the candidate
- Recruitment agencies
- Publicly accessible sources such as LinkedIn

Sobi's North American organisation has a legal obligation to collect information on gender, disability, ethnicity, and veteran status in order to be compliant with local North American legislation. This does not apply to any other country or region.

We may also collect personal data about you from third parties, such as information from the background check service provider, and/or references supplied by former employers. However, such information will only be collected if you are offered a position at Sobi or your application for employment is successful.

How will we use information about you?
To pursue Sobi's legitimate interest as a business and to be able to fulfil our recruitment process in an adequate manner, we will use your personal information to progress your application with a view to offering you an employment contract and to comply with legal and/or regulatory requirements in connection therewith.
We will not be able to process your application successfully if you fail to provide information necessary for us to consider your application.
The personal data may also be used for the development by Sobi of aggregated anonymous statistics for internal purposes.

Who has access to your data?
Your personal data may be shared internally for the purposes of the recruitment process. This may include members of the HR team, Hiring Managers in the business area with a vacancy and IT staff. Your personal data may also be shared with our third party service providers in connection with the recruitment process. This may include recruitment agencies and service providers performing background checks.

We use SmartRecruiters, Inc. ("SmartRecruiters") SaaS platform (the "platform") as our CRM for management and administration of our talent acquisition, sourcing and recruitment process. SmartRecruiters act as Sobi`s data processor for these purposes but may act as data controller of your personal data if you use the platform to review or apply for other jobs not related to Sobi.

We have ensured that appropriate security measures are put in place in all of our systems and third-party service providers to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way.

Some personal data may be transferred to and handled by local Sobi affiliates and authorities, both inside and outside the European Union. The purpose of such transfers may be the duty to report to authorities and the need of supplying information for cooperation within the group of affiliated companies. The personal data will be stored at externally hosted databases in Frankfurt, Germany. Sobi operates around the world and this means that your personal data may be transferred outside the European Economic Area (EEA), in some cases to jurisdictions which may not have an adequate level of protection. However, we have taken appropriate safeguards to ensure that your personal data will remain protected in accordance with this notice. These measures include, where applicable, implementing EU standard contractual clauses with our third-party contractors.

Where you are located in China and the Personal Information Protection Law ("PIPL") applies, for the purposes of conducting recruitment and HR management within China and having business communication, we will transfer your personal data (including name, email address, country of residence, phone number) to Swedish Orphan Biovitrum AB (publ) in Sweden and Sobi Inc. in US who will act as "Overseas Recipient" via Public Internet and Private Internet. The contact details and channel for exercising data subject rights is privacy@sobi.com.

The Overseas Recipient will collect, store, use information system service providers to process the Personal Data for the purposes of conducting Recruitment, HR management, internal cross-border communication and compliance related activities to Sobi and its affiliates.

How do we use Artificial Intelligence in our recruitment process?

We want to inform you about the use of artificial intelligence (AI) features during the recruitment process which are part of the SmartRecruiters` platform that we use.

SmartRecruiters` platform utilizes AI features to assist in the recruitment process by providing recommendations and insights to our hiring team. The AI system analyzes the information provided in your application, such as your resume, cover letter, and responses to application questions, to generate recommendations. These recommendations may include highlighting relevant skills, experiences, or qualifications that match the requirements of the job position.

It is important to note that the AI feature's recommendations are solely for the purpose of assisting our hiring team and are not used to make any hiring decisions. All decisions regarding your application, including shortlisting, interviewing, and hiring, are made by our recruiters and hiring managers. The AI system does not have the functionality to accept or reject applications, and its recommendations are only one of many factors considered in our comprehensive evaluation process.

We ensure that all data processed by our AI feature is handled in accordance with applicable data protection laws and our privacy policy. The information you provide in your application is securely stored and used only for the purposes of recruitment.

Data Retention

We will retain your personal information for a period of time in line with applicable legislation or the legitimate business needs related to the recruitment process. Your data is anonymised at the end of that period.

If we wish to retain your personal information on file, on the basis of wishing to consider you for a potential future opportunity, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Your Rights

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

- request access to your personal data
- request us to change any incomplete or inaccurate information we hold about you
- request us to delete or remove your data where there is no good reason for us continuing to process it;

- object to processing of your data where we are relying on a legitimate interest
- request to suspend the processing of personal information about you
- request to transfer your data to another party

California Residents specific rights

If you are a California resident, you may request that we:

Disclose to you the following information covering the 12 months preceding your request:

- The categories of Personal Information we collected about you and the categories of sources from which we collected such Personal Information;
- The specific pieces of Personal Information we collected about you;
- The business or commercial purpose for collecting Personal Information about you; and
- The categories of Personal Information about you that we otherwise shared or disclosed and the categories of third parties with whom we shared or to whom we disclosed such Personal Information.
- Delete Personal Information we collected from you.

In some instances, we may decline to honor your request where an exception applies, such as where the disclosure of Personal Information would adversely affect the rights and freedoms of another California resident.

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

If you wish to exercise any of these rights or if you have any questions or concerns about the use of AI in our recruitment process, please contact t Swedish Orphan Biovitrum AB (publ), SE-112 76 Stockholm, Sweden, call us at
+46(0)8 697 20 00 or write to the DPO at privacy@sobi.com.

You also have the right to file a complaint to the supervisory authority:
Swedish Supervisory Authority, IMY, www.imy.se