



## Recruitment Privacy Notice for EEA | Swiss | UK Residents

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### Introduction

At Blueprint Medicines Corporation (along with its subsidiaries and affiliates collectively “Blueprint”, “us” or “we”), we recognize the importance of, and are fully committed to protecting the privacy of personal data related to all individuals with whom we interact. For the purposes of this notice Blueprint is the data controller, meaning that is responsible for determining the means and the purposes of processing activities. If you apply via a third party platform (such as LinkedIn; Indeed), the parties owning these platforms may also access your personal details through your personal profiles and thus will also act as data controllers.

Blueprint uses the Oracle Corporation (2300 Oracle Way, Austin, TX 78741, United States) platform to manage and administer its talent acquisition, sourcing and recruitment process. This notice only applies to the personal data of job applicants, potential candidates for employment and job referrals and our optional recruiting programs and events concerning individuals residing in the EEA, Switzerland, or in the UK. It does not apply to our employees, contractors or clients, or other personal data that Blueprint collects for other purposes. This notice describes how we handle, process and protect your personal data in connection with Blueprint’s recruiting processes and programs as well as informing you of the rights that you have under the General Data Protection Regulation 2016/679 (“GDPR”) as well as the UK and Swiss Data Protection Acts as amended and in force (hereinafter “Applicable Data Protection Laws”). Please read this notice carefully prior to providing your personal data to Blueprint.

For the purposes of this notice, “personal data” means information that identifies job applicants and potential candidates residing in the EEA, Switzerland, or in the UK for employment with us, either submitted as part of the online application and/or through alternative channels (e.g., via professional recruiting firms; social channels; and/or directly via our HR dedicated email).

We will process your personal data in accordance with this notice, unless such processing conflicts with the requirements of Applicable Data Protection Laws, in which case, applicable legislation will prevail.

### Purposes of processing your personal data

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

- assess your skills, qualifications and suitability for potential employment;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment and hiring process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.



We may also analyze your personal data or aggregated/anonymized data to improve our recruitment and hiring process and augment our ability to attract successful candidates.

### **Automated Decision Making**

We do not make recruiting or hiring decisions based solely on automated decision-making.

### **Personal data we collect**

In connection with your application for work with us, we will collect store and use the following categories of information. This represents the minimal amount of personal data required for us to make a recruitment decision and to contact you about that decision. This information will normally include:

- your name, employment history and academic qualifications, and any other information that you have provided to us in your curriculum vitae and cover letter;
- your LinkedIn account profile details in case that you have applied through your LinkedIn account;
- the information you have provided on our application form, if relevant, including title, address, telephone number, personal email address, date of birth; and
- any information you provide to us during an interview.

The types of personal data that we request from you and the ways that we process it are determined by the requirements of the country in which the position is located, and not the country in which you reside. Should you apply to more than one location or should the role to which you apply be available in more than one country, the types of personal data we request from you and the ways that we process it are determined by the requirements of all the countries in which the position is located.

Special categories of personal data are a subset of personal data and include ethnicity, health, trade union membership, philosophical beliefs, criminal convictions and offences, as well as other categories as allowed by law. We will seek to obtain and collect such data about a candidate if required to do so by applicable laws. We encourage you to exclude any special categories of personal data in your application including in your cover letter. Should you voluntarily provide such information, this information will be processed in accordance with and to the extent permitted by Applicable Data Protection Laws along with our standard business practices.

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 background 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.



## Sources of data collection

We collect personal data about job applicants residing in the EEA, Switzerland, or in the UK from the following sources:

- directly from the candidates;
- recruitment agencies, from which we collect data similar to that specified above;
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- named referees – prior employers; and
- from publicly available professional networking profiles e.g., LinkedIn.

## Lawfulness of processing

We must have a legal basis to process your personal data. Most commonly, the conditions for processing your personal data in relation to recruitment will be one of the following:

- Consent - You have given your consent for the processing to take place, e.g., contacting and disclosing information to a referee or for pre-employment screening where applicable;
- Legitimate interests - the processing is necessary for our legitimate interests or the legitimate interests of a third party, e.g., to process and assess your application for employment with us; and
- Legal obligation - the processing is necessary in order to comply with legal or regulatory requirements, e.g., for immigration compliance.

Where we have relied on your consent, you have the right to withdraw your consent at any time. For further information on how to withdraw your consent please see the “Your Rights” section.

## Data sharing

The access to your personal data is restricted to people within Blueprint on a “need to know” basis according to their job role and responsibilities (i.e., HR managers; IT personnel).

We may also share your personal data with trusted third parties to manage recruitment including our recruiting agencies to assist us in recruiting talent, administering and evaluating pre-employment screening and testing and improving our recruiting practices

Blueprint maintains processes designed to ensure that any processing of personal data by third party service providers is consistent with this notice and Blueprint’s online privacy policy available [here](#).

Where Blueprint processes personal information in countries that may not provide the same level of data protection as in your residency country, Blueprint will implement reasonable and appropriate legal, technical and organisational security measures with the aim to ensure the security of the processing and in particular to protect your personal data from unauthorised access, use or disclosure. In the absence of an adequacy decision adopted by the competent authority, Blueprint will implement appropriate data transfer mechanisms (such as the execution



of data transfer agreements as appropriate) for any cross border data transfers to secure such transfers and achieve an adequate level of data protection.

In general terms, we may not provide access to your personal data unless this is required by applicable legislation and/or is necessary for enforcement legal proceedings.

### **Data retention**

Whether you have applied directly for an open position, submitted a speculative application or been sourced by us through LinkedIn or other channel, we will retain your personal information for a maximum period of 2 years after the submission of your application to us. 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 and to consider you for potential future roles and employment opportunities. After this period, we will securely destroy your personal information in accordance with our data retention procedures. If we wish to retain your personal information on file for a longer period than the above mentioned, on the basis that a further opportunity may arise in the future for which we may wish to consider you, we will contact you separately and ask for your permission to do so.

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific country requirements and internal policies and procedures.

### **Your rights**

Under Applicable Data Protection Laws and subject to any legal restrictions, you may have the right to request us to:

- Provide you with further details on the processing of your personal data;
- Provide you access to your personal data that we hold about you;
- Update any inaccuracies in the personal data we hold that is demonstrated to be inaccurate or incomplete;
- Delete any personal data that we no longer have a lawful basis to use;
- Provide you or a third party, with a copy of your data in a digital format (data portability);
- Stop a particular processing when you withdraw your consent;
- Object to any processing based on the legitimate interests or public interest to process information, unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- Restrict certain aspects of the processing of your data.

In addition, and if you have any unresolved concerns, you have the right to lodge a complaint with the competent data protection authority in your [country](#).



### **More information and Concerns**

If you wish to learn more about Blueprint's commitment to privacy, please read our privacy policy available [here](#). If you have any questions about this notice or if you have any concerns over the way that we are processing your data, require any further information about your rights set out above or wish to exercise any of your rights, please contact us at [EUprivacy@blueprintmedicines.com](mailto:EUprivacy@blueprintmedicines.com).

**Blueprint reserves the right to modify this Privacy Notice. We will post any changes made to our Privacy Notice on this page. Please check this page regularly to keep up-to-date.**

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*Last Updated: October 1, 2021.*