



## RECRUITMENT PRIVACY POLICY

### 1. PURPOSE

Telix is committed to respecting the privacy and protecting the personal data of all individuals it deals with. This Recruitment Privacy Policy (“**Policy**”) describes how Telix Pharmaceuticals Limited, and its affiliated companies worldwide (together referred to as “**Telix**”), collects and processes your personal data in connection with its recruitment activities.

The purpose of this Policy is also to inform you of your rights as a data subject under the Applicable Data Protection Laws. Applicable Data Protection Laws are understood to be the regulations that may apply to the processing of your information, including, but not limited to, Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR), the UK Data Protection Act 2018, (UK DPA), Australia’s Privacy Act 1988 and its Australian Privacy Principles (APPs), Japan’s Act on the Protection of Personal Information (APPI), Switzerland’s Federal Act on Data Protection (FADP), the California Consumer Privacy Act (CCPA) or other US State Privacy Laws that may apply.

### 2. SCOPE

This Policy applies to job applicants, potential candidates for employment, and current employees applying for another position within Telix Pharmaceuticals Limited and its affiliated companies worldwide.

### 3. REFERENCED DOCUMENTS

Additional policies that align with this Policy:

- [Privacy Policy](#)
- [Cookies Policy](#)

### 4. POLICY

This Policy describes how Telix collects and processes personal data in connection with its recruitment activities worldwide.

#### 4.1. Data Controller

The responsible entity for the processing of your personal data in relation to our recruitment processes is the Telix entity which is offering the role that you wish to apply for. You can find an overview of all Telix entities and offices on our website: <https://telixpharma.com/contact/>.

Telix welcomes any questions or comments you may have regarding this Policy or its implementation. Any such questions, comments or requests should be submitted to [privacy@telixpharma.com](mailto:privacy@telixpharma.com) or by regular mail to:

Telix Pharmaceuticals Limited  
Attn: General Counsel  
Level 4, 55 Flemington Road  
North Melbourne, VIC 3051  
Australia

In compliance with Applicable Data Protection Laws, Telix has appointed a Data Protection Officer to whom you may address any queries you may have and exercise your data protection rights by sending a request to the same addresses.

#### 4.2. Personal Data Collection

When you apply for a job at Telix, we collect and process the following categories of personal data, only to the extent that we deem it relevant for the assessment of your application.

- **Contact information:** Your name, email address, postal address, phone number, city, country of residence, and postal code.
- **Personal details:** Personal data on your CV, resume, cover letter or other material you submit to us in support of your application, such as your gender, date of birth, academic qualifications, work experience, languages spoken, salary and job expectations, information about your work permit or visa status, and any other information you choose to share with us (for instance, a photograph).



- **Interview notes:** If you attend an interview (online or in person), we will likely keep notes about the conversation you had with our recruiters. We can also take notes of our interactions and correspondence with you (specifically our emails with you and the notes we make in relation to our telephone conversations, meetings or other interactions with you). We only take notes of the information that is relevant for our assessment of whether we should offer you a position or not.
- **Assessment results:** If you are asked to complete a skills assessment, personality profile, or any other selection-related evaluation as part of the recruitment process, we may collect information generated from these assessments. These assessments may be administered by a trusted third-party provider, and we receive the results and related information from that provider for recruitment and evaluation purposes.
- **Physical access information:** If you visit our premises, we may generate data in connection with your attendance through our building access control systems and CCTV cameras, to the extent permitted by applicable laws.
- **Financial details:** In certain circumstances we might want to reimburse you for any costs created by you during the recruitment process. To process such reimbursement, we require limited financial details from you, such as your bank account number.
- **Reference and background checks:** Depending on your location, and only where permitted under applicable law, we conduct reference and background checks—including criminal record checks where applicable—through our third-party provider, ABGlobal. This may include collecting information from individuals you know as well as information obtained directly from ABGlobal as part of the pre-employment screening process.
- **Publicly available information:** In some cases, we will seek out relevant publicly available information on the internet, including social media (such as LinkedIn).
- **Technical data:** We automatically collect certain information from you when you use our Careers page, including IP address or other unique device identifiers, and information collected by cookies on your usage of our website. For more information, please see our Cookie Policy as noted above.

We may also collect and process the following “special categories” of more sensitive personal data:

- **Health information:** If you choose to disclose such data, we will use information about your medical condition and/or disability status to make any reasonable adjustments/accommodations during the recruitment process and to ensure your health and safety.
- **Diversity, equity and inclusion information:** Depending on the location of the job that you are applying for and/or the country you are applying from, and only to the extent permitted by applicable laws, you may in addition be asked to provide other sensitive information as part of your application, such as your gender, age, ethnicity, nationality, citizenship, etc. These questions are intended to help us make sure our hiring process is inclusive and fair for everyone.

If you are unwilling to provide certain information when requested, we may not be able to process your application successfully (where the information is necessary for us to consider your application) or enter into a contract with you, or we may be prevented from complying with our legal obligations.

#### 4.3. Data Obtainment

We collect most of the information from you directly, such as when you submit a job application, when you correspond with us, or when we conduct an interview or skills assessment. We may supplement the information that you provide to us with information that we receive later on from third parties, including former employers, referrals, head-hunters or recruitment agencies and background check providers.

#### 4.4. Use of Personal Data

We collect and process your personal data for a number of purposes and where we have a legal basis to do so, as follows:

##### Recruitment purposes:

- **To administer your job application.** Processing data from candidates primarily allows us to manage the recruitment process, make an honest evaluation of your suitability for the role you are applying for, and ultimately select the best possible candidate. This includes assessing your skills and qualifications and keeping records

related to our hiring processes. This also includes communicating with you throughout the recruitment process. For example, we may respond to your requests, update you on the status of your application, or invite you for recruitment activities such as an interview or additional assessment rounds. If you are offered a job at Telix and you have accepted the offer, your information will also be used to create an employment record and prepare your employment agreement or offer letter. This processing is necessary to take steps at your request prior to entering into a contract.

- **To inform you about new suitable vacancies.** If you send us an open application or if we are unable to offer you a position at the current time, we may ask you to consent for our continued retention of your personal data in our Talent Pool following the end of the recruitment process. If you have consented to this, we will send you updates on fresh job openings. You may at any time withdraw your consent and request us to delete your personal data. For this purpose, please contact [privacy@telixpharma.com](mailto:privacy@telixpharma.com)
- **To ask you about your experience within the recruitment process.** We may offer you the option to participate in a survey about your satisfaction with the application process. The information provided in the survey will be processed for internal purposes (e.g., to evaluate and improve our recruitment processes). The processing is based on your consent. The data will be aggregately processed, so that the data cannot be traced back to you.

#### **Regulatory compliance and safety purposes:**

- **To verify your information and conduct pre-employment background checks.** Only where permitted under the local laws of the territory where the job position is based, and where appropriate given the nature of the role, we may verify the details you have supplied (for example, in relation to your identity, employment history, academic qualifications and professional credentials) and undertake checks to seek assurance as to your trustworthiness, integrity and reliability (for example, in relation to previous criminal convictions or financial standing). The level of checks will depend on your location and on your role, in particular whether you will occupy a regulated function, and will be conducted at as late a stage as is practicable in the hiring process and often only after you have been selected for the position. You must successfully complete pre-employment checks to progress to a final offer. It is necessary for us to process your information for these purposes in order to comply with legal obligations to which we are subject or to pursue our legitimate interests in hiring appropriate staff.
- **To monitor equal opportunities and diversity.** As part of our commitment to create an inclusive and diverse work environment, and only where and to the extent permitted by applicable laws, we may ask you to provide certain demographic data for statistical analysis. You are only required to answer the questions marked as mandatory in order for your application to be processed, while other questions that are not marked as mandatory may be answered on a voluntary basis and your election not to answer such voluntary questions will not affect your chances in the application process. Any information provided is aggregated and not retained in a manner which identifies a specific individual. We do not store any such data with your records. We process your information for this purpose based on your consent.
- **To maintain the security of our premises and systems.** We record and keep evidence of the dates and times visitors (including job applicants) enter and leave our offices, through access control systems. Images of you may also be captured on CCTV systems that are in operation inside and/or outside of our buildings. It is necessary for us to process your information for these purposes in order to meet our legitimate interests relating to managing access and ensuring the prevention and investigation of any incident.
- **To repay approved expenses incurred as part of our recruitment processes.** We may use your personal data where it is necessary to reimburse you for expenses related to travel, lodging and other approved expenses. This processing is based on the performance of pre-contractual measures.
- **To manage litigation and other legal disputes and inquiries.** Furthermore, we may process personal data about you where this is necessary to respond to and defend ourselves against legal claims arising from the application process that are brought against us. It is necessary for us to process your information for these purposes in order to meet our legitimate interests relating to the defence of our rights.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you prior to processing and we will explain the legal basis which allows us to do so.

#### **4.5. Personal Data Retention**

Your personal data will be retained as long as it is necessary to evaluate your application for employment.



If you are offered and accept employment with Telix, the information collected during the recruitment process will become part of your employee record. More information can be found in the privacy notice for employees that we will provide to you on acceptance of the job.

If your application is unsuccessful (or if you withdraw from the recruitment process or decline our offer), we will store your data for a period of two (2) years after you have been rejected from, withdrawn from or declined any offer of employment.

After this two-year period, any identifiable data will be aggregated, so your application data can no longer be associated with you. We do this for reporting purposes only, to help us better understand, analyze and improve our recruitment process.

This does not apply if mandatory statutory provisions and/or requirements from authorities or courts oppose such deletion, or if you have explicitly consented to your inclusion in the Talent Pool. In the latter case, we will store your data until you revoke your consent, but for no longer than three (3) years. After this period, we may ask for your consent again to retain your data for another extended period of time.

#### 4.6. Personal Data Access

Your information may be shared internally within Telix for the purposes of the recruitment process. This includes members of the People & Culture team, interviewers involved in the recruitment process, and managers in the business area(s) relevant to your application. In addition, your personal data may be accessed, where necessary, by our IT staff (e.g., to maintain our HR software). This may result in your information being transferred to one or more of our offices and affiliates worldwide.

We may also share your personal data with certain trusted third parties, including:

1. **Service providers and contractors.** We disclose your personal data to vendors, consultants and other service providers who assist us in our recruiting efforts and in meeting our business needs and legal obligations pertaining to job applicants, subject to written contracts as required by applicable law. This includes providers of human resource consulting and outsourcing services, recruitment agencies and headhunting firms, IT services providers, background checks providers, and any other entity providing services to Telix.

For operating our applications portal and managing your application, we use the technical solution "Greenhouse" from the company Greenhouse Software / Industrious, 250 W 34th Street, Suite 329 New York, NY 10119, USA. The data provided by you are stored and processed on our behalf by Greenhouse, on servers in the United States. Accordingly, if you are located outside of the United States, your personal data will be transferred to the United States once you submit it. Further information on Greenhouse is available at: <https://www.greenhouse.io/>.

For handling our assessments, we use a technical solution "SHL" that is integrated into Greenhouse from the company SHL, Suite 26, 2 Locomotive Street, South Eveleigh, NSW 2015, Australia. The data provided by you are stored and processed on our behalf by SHL. Further information on SHL is available at: <https://www.shl.com>.

For handling our WhatsApp and SMS messaging, we use a technical solution "Grayscale" that is integrated into Greenhouse from the company Grayscale, 3423 Piedmont Rd NE, Atlanta, GA 30305, USA. The data provided by you are stored and processed on our behalf by Grayscale. Further information on Grayscale is available at: <https://www.grayscaleapp.com>.

2. **Law firms or other advisors.** We may disclose your personal data to the lawyers or legal consultants helping us to exercise, establish, or defend our legal rights.
3. **Government or administrative agencies.** In the event of a legal obligation, we reserve the right to disclose information about you if we are required to surrender it to competent authorities or law enforcement bodies.
4. **Potential purchasers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, acquisition, dissolution, corporate reorganization, or similar event affecting the Telix group of companies.

We take care to limit access to your personal data to only those who need access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. We have entered into contracts with our processors, who are required to keep your personal data confidential and who may not use it other than as we ask them to and always in accordance with this Policy.

Where personal data is disclosed to third parties, appropriate safeguards are implemented to ensure that the data is processed legitimately and protected appropriately. We only permit them to process your personal data for specified



purposes and in accordance with our instructions. When providing data to third parties worldwide, Telix ensures appropriate safeguards are in place.

#### 4.7. Personal Data Protection

We take the safeguarding of your information very seriously. Telix takes all steps reasonably necessary to ensure that there are appropriate technical and organizational security measures in place to safeguard your personal data.

#### 4.8. Data Transfer to Other Countries

Due to the international nature of our business, your data might be transmitted to a country in which our affiliates or the trusted third parties are located.

When transferring your data to recipients who are located outside of the country where the role you are applying to is based, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. We will also ensure that appropriate safeguards are in place.

**If you are located in the EEA, in the UK or in Switzerland:** We may transfer your data to and store it in third countries which do not offer an equivalent level of protection to your country. Such transfers will be made subject to appropriate legal safeguards, including under European Commission and/or UK approved Standard Contractual Clauses (SCCs), or by relying on other data transfer mechanisms which may be available under applicable data protection laws.

#### 4.9. Your Rights Regarding Your Personal Data

Subject to applicable data protection laws, you may have certain rights regarding the information we hold about you. Telix supports the exercise of these rights.

**If you are located in Australia,** you have rights including: the right to request the erasure of your Personal Information; the right request not to receive direct marketing communications; right to opt-out of specific processing activities; right to anonymity; right to access the Personal Information Telix is handling; and the right to rectify your Personal information; within the limits established by the Australian Privacy Act 1988 and the APPs. You have also the right to lodge a complaint with the Office of the Australian Information Commissioner (<https://www.oaic.gov.au/>) if you believe we have breached our data protection obligations.

**If you are located in Japan:** You have the right to request access or the disclosure of your personal data, to rectify inaccurate or incorrect personal information, to request the erasure of your personal data, and to request the discontinuance of the utilization or disclosure of your personal information, to request suspension of data disclosure to third parties and to receive notification of records of disclosures to third parties within the limits and requirements established by the APPI. You have also the right to lodge a complaint with the Personal Information Protection Commission of Japan if you believe we have committed a breach of our data protection obligations (<https://www.ppc.go.jp/en/>)

**If you are located in California:** You have the right to request access to your personal data, to correct incomplete or inaccurate personal information we may be processing, to limit the use and disclosure of any sensitive personal information, to delete your personal information as applicable, to know what personal information about you is being sold or shared and to who, and to opt-out of the sale or sharing of your personal information, within the limits and requirements established by the California Consumer Privacy Act (CCPA). You have also the right to lodge a complaint with the California Privacy Protection Agency (<https://cppa.ca.gov/>) if you believe we have committed a breach of our privacy obligations.

**If you are located in any other state in the United States:** You have the right to request access to your personal data and have incorrect or incomplete personal data rectified. You also have the right to request the deletion or portability of your data, not to be subject to automated individual decisions, to opt-in to the processing of Sensitive Information (if applicable) and to limit its use, in accordance with US State Privacy Laws. You have also the right to lodge a complaint with the competent State Attorney General.

**If you are located in the EEA, in the UK or in Switzerland:** You have the right to request access to your personal data, to have it rectified or erased, to object to its processing or have it restricted. You may also have the right to receive a copy of your personal data, to have your personal data sent to another party (portability) and/or the right not to be subject to any decision that significantly affects you and is taken solely by automated processing, including profiling. You have also the right to withdraw your consent given at any time. You have also the right to lodge a complaint with the Belgian Data Protection Authority (<https://www.dataprotectionauthority.be/citizen>), the Information Commissioner's Office of the United Kingdom (<https://ico.org.uk/>) or the Swiss Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/en>).



We will process all requests in a timely manner in line with applicable laws. You should make such requests in writing to [privacy@telixpharma.com](mailto:privacy@telixpharma.com). We may ask you for additional information to confirm your identity before actioning your request.

In certain instances, local data protection and privacy laws may allow us to legitimately and properly refuse your requests (for instance, to protect the rights of third parties or if you have asked us to delete information which we are required by law or have compelling legitimate interests to keep).

## **5. CHANGES**

We may update this Policy from time to time. Any changes we make to this Policy in the future will be posted on this page with a revised effective date.