

JOB APPLICANT PRIVACY NOTICE

Sumitomo Pharma Oncology, Inc.

(Updated and Effective: December 19, 2022)

Some U.S. States require businesses to make certain disclosures regarding their collection, use, and disclosure of Personal Information. This Privacy Applicant Notice provides such information to Sumitomo Pharma Oncology, Inc. ("SMP Oncology") applicants (Applicants). Please note that this Notice only addresses SMP Oncology's collection, use, and disclosure of applicant-related Personal Information. It applies to all U.S. residents including those States specifically identified in Appendix A. This Notice does not apply to individuals who are residents of other countries and/or who do not interact with SMP Oncology in an applicant-related capacity. For further details about our privacy practices pertaining to non-Applicant Personal Information, please see our [Privacy Notice](#).

As an Applicant, you have the right to know what categories of Personal Information SMP Oncology collects, uses, discloses, Sells, and Shares about you. This Notice provides that information and other disclosures required by law.

If you have any questions regarding this Privacy Notice or SMP Oncology's collection and use of your personal information, please click [here](#) or call 1-888-394-7377. If you wish to receive this notice in an alternate format, please call 1-888-394-7377

A. DEFINITIONS

- **Personal Information:** As used in this Policy, "Personal Information" means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. Personal Information includes Sensitive Personal Information but does not include protected health information covered by the Health Information Portability and Accountability Act (HIPAA), nonpublic personal information under the Gramm-Leach-Bliley Act (GLBA), or any other information which is exempt from the CCPA.
- **Sensitive Personal Information:** As used in this Policy, "Sensitive Personal Information" includes Personal Information that reveals, among other things, social security number, driver's license number, state identification card number, passport number, racial or ethnic origin, union membership, or the contents of a Consumer's mail, email, and text messages, unless SMP Oncology is the intended recipient of the communication. Sensitive Personal Information also includes information concerning the Applicant's health, sex life, or sexual orientation.
- **Other CCPA Definitions:** As used in this Policy, the terms "Collect," "Processing," "Service Provider," "Third Party," "Sale," "Share," "Consumer," and other terms defined in the CCPA and their conjugates, have the meanings afforded to them in the CCPA, whether or not such terms are capitalized herein, unless contrary to the meaning thereof.

B. APPLICANTS

• Collection & Processing of Personal Information

We, and our Service Providers, may have Collected and Processed the following categories of Personal Information from Applicants in the preceding 12 months:

- (1) Identifiers, such as a real name, alias, postal address, telephone number, online identifier, internet protocol (IP) address, email address, social security number, or other similar identifiers;

- (2) Characteristics of protected classifications under California or federal law, such as race, gender, physical or mental disability, and religion;
- (3) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- (4) Professional or employment-related information;
- (5) Education information or other academic information;
- (6) Written signatures;
- (7) Inferences drawn from any of the information listed above to create a profile about an individual reflecting the individual's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. (e.g., predications about an individual's preferences or tendencies);
- (8) In addition to the purposes identified above, SMP Oncology may use and disclose any and all personal information that we collect as necessary or appropriate to:
 - a. Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws.
 - b. Monitor, investigate, and enforce compliance with and potential breaches of SMP Oncology policies and procedures and legal and regulatory requirements.
 - c. Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons.
 - d. Exercise or defend the legal rights of SMP Oncology and its employees, affiliates, customers, contractors, and agents.

- **Categories of Applicant Personal Information We Disclose to Service Providers & Third Parties**

We disclose the following categories of Applicant Personal Information to Service Providers and Third Parties:

- (1) Identifiers, such as a real name, alias, postal address, telephone number, online identifier, internet protocol (IP) address, email address, social security number, or other similar identifiers;
- (2) Characteristics of protected classifications under California or federal law, such as race, gender, physical or mental disability, and religion;
- (3) Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- (4) Professional or employment-related information;
- (5) Education information or other academic information;
- (6) Written signatures;
- (7) Inferences drawn from any of the information listed above to create a profile about an individual reflecting the individual's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. (e.g., predications about an individual's preferences or tendencies);
- (8) In addition to the purposes identified above, SMP Oncology may use and disclose any and all personal information that we collect as necessary or appropriate to:
 - a. Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws.
 - b. Monitor, investigate, and enforce compliance with and potential breaches of SMP Oncology policies and procedures and legal and regulatory requirements.
 - c. Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons.
 - d. Exercise or defend the legal rights of SMP Oncology and its employees, affiliates, customers, contractors, and agents.

- **Purposes for Processing Applicant Personal Information**

We, and our Service Providers, Collect and Process Applicant Personal Information (excluding Sensitive Personal Information) described in this Policy to:

- Perform background checks and verify past employment, educational history, and professional standing and qualifications;
- Contact you regarding your application and potential employment or contractor relationship with us;
- This optional information is collected for federal reporting requirements;
- Evaluate, determine, and arrange benefits, such as relocation assistance;
- Evaluate a potential employment relationship with you;
- Perform background checks and verify past employment, educational history, and professional standing and qualifications;
- Evaluate a potential employment relationship with you;
- Perform background checks and verify past employment, educational history, and professional standing and qualifications;
- Required on job offer and non-disclosure agreement;

In addition to the purposes identified above, SMP Oncology may use and disclose any and all Applicant Personal Information that we Collect as necessary or appropriate to:

- Comply with laws and regulations, including, without limitation, applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws;
- Monitor, investigate, and enforce compliance with and potential breaches of SMP Oncology policies and procedures and legal and regulatory requirements;
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and
- Exercise or defend the legal rights of SMP Oncology and its employees, affiliates, customers, contractors, and agents.

C. PROCESSING SENSITIVE PERSONAL INFORMATION

We, and our Service Providers, Collect and Process the Sensitive Personal Information described in this Policy only for:

- Performing the services or providing the goods reasonably expected by an average Consumer who requests those goods or services;
- Ensuring security and integrity to the extent the use of the Consumer's Personal Information is reasonably necessary and proportionate for these purposes;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a Consumer's current interaction with us; provided that we will not disclose the Consumer's Personal Information to a Third Party and/or build a profile about the Consumer or otherwise alter the Consumer's experience outside the current interaction with the business;
- Performing services on our behalf, including maintaining or servicing accounts, providing customer service, processing, or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on our behalf;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

D. SOURCES FROM WHICH WE COLLECT APPLICANT PERSONAL INFORMATION

We Collect Personal Information directly from all Applicants, including Personal Information about Applicants' beneficiaries or dependents. We also Collect Personal Information from joint marketing partners, public databases, providers of demographic data, publications, professional organizations, educational institutions, social media platforms, Service Providers and Third Parties that help us screen and onboard individuals for hiring purposes, and Service Providers and Third Parties when they disclose information to us.

E. CATEGORIES OF ENTITIES TO WHOM WE DISCLOSE APPLICANT PERSONAL INFORMATION

- **Affiliates & Service Providers.** We may disclose Applicant Personal Information to our affiliates and Service Providers for the purposes described in Sections B of this Policy. Our Service Providers provide us with Applicant selection and related hiring services, benefits and wellness services, website services, as well as other products and services, such as web hosting, data analysis, customer service, infrastructure services, technology services, email delivery services, legal services, and other similar services. We grant our Service Providers access to Personal Information only to the extent needed for them to perform their functions and require them to protect the confidentiality and security of such information.
- **Third Parties.** We may disclose your Personal Information to the following categories of Third Parties:
 - **At Your Direction.** We may disclose your Personal Information to any Third Party with your consent or at your direction.
 - **Business Transfers or Assignments.** We may disclose your Personal Information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
 - **Legal and Regulatory.** We may disclose your Personal Information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

F. DATA SUBJECT RIGHTS

- **Data Subject Rights Available to You.** As an Applicant, you have the following rights regarding our Collection and use of your Personal Information, subject to certain exceptions:
 - **Right to Receive Information on Privacy Practices:** You have the right to receive the following information at or before the point of Collection:
 - The categories of Personal Information to be Collected;
 - The purposes for which the categories of Personal Information are Collected or used;
 - Whether or not that Personal Information is Sold or Shared;
 - If the business Collects Sensitive Personal Information, the categories of Sensitive Personal Information to be Collected, the purposes for which it is Collected or used, and whether that information is Sold or Shared; and
 - The length of time the business intends to retain each category of Personal Information, or if that is not possible, the criteria used to determine that period.

We have provided such information in this Policy, and you may request further information about our privacy practices by contacting us as at the contact information provided below.

- **Right to Deletion:** You may request that we delete any Personal Information about you that we Collected from you.

- **Right to Correction:** You may request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Know:** You may request that we provide you with the following information about how we have handled your Personal Information in the 12 months preceding your request:
 - The categories of Personal Information we Collected about you;
 - The categories of sources from which we Collected such Personal Information;
 - The business or commercial purpose for Collecting, Selling, or Sharing Personal Information about you;
 - The categories of Third Parties with whom we disclosed such Personal Information; and
 - The specific pieces of Personal Information we have Collected about you.
- **Right to Receive Information About Onward Disclosures:** You may request that we disclose to you:
 - The categories of Personal Information that we have Collected about you;
 - The categories of Personal Information that we have Sold or Shared about you and the categories of Third Parties to whom the Personal Information was Sold or Shared; and
 - The categories of Personal Information we have disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.
- **Right to Non-Discrimination:** You have the right not to be discriminated against for exercising your data subject rights. We will not discriminate against you for exercising your data subject rights. For example, we will not make hiring, firing, promotion, or disciplinary decisions based on or in consideration of your exercise of your data subject rights. We also will not deny goods or services to you, charge you different prices or rates, or provide a different level of quality for products or services as a result of you exercising your data subject rights.
- **Rights to Opt-Out of the Sale and Sharing of Your Personal Information and to Limit the Use of Your Sensitive Personal Information:** You have the right to opt-out of the Sale and Sharing of your Personal Information. You also have the right to limit the use of your Sensitive Personal Information. For purposes of the California Consumer Privacy Act (CCPA), a “Sale” is the disclosure of Personal Information to a Third Party for monetary or other valuable consideration, and a “Share” is the disclosure of Personal Information to a Third Party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration. SMP Oncology does not Sell your Personal Information and only Shares your Personal Information with Service Providers in order to process your job application.
- **Exercising Data Subject Rights.** Applicants may exercise your data subject rights by submitting a request from our [Privacy Request Portal](#) or by calling 1-888-394-7377. You may also authorize an agent to make a data subject request on your behalf, and the authorized agent may do so via the above-listed submission methods.
- **Verification of Data Subject Requests.** We may ask you to provide information that will enable us to verify your identity in order to comply with your data subject request. In particular, if you authorize an agent to make a request on your behalf, we may require the agent to provide proof of signed permission from you to submit the request, or we may require you to verify your own identity to us or confirm with us that you provided the agent with permission to submit the request. In some instances, we may decline to honor your request if an exception applies under the CCPA. We will respond to your request consistent with applicable law.

G. OTHER DISCLOSURES

- **Retention of Personal Information:** We retain each of the above-listed categories of Personal Information for the duration of your Applicant relationship with us, as applicable, and longer as may be required by applicable laws or necessary for our legitimate business purposes.
- **Financial Incentives for California Consumers.** Under California law, we do not provide financial incentives to California Consumers who allow us to Collect, retain, or Share their Personal Information. We will describe such programs to you if and when we offer them to you.
- **Changes to this Notice.** We reserve the right to amend this Notice at our discretion and at any time. When we make material changes to this Notice, we will notify you by posting an updated Notice on our website and listing the effective date of such updates.

H. CONTACT US

More information about our privacy practices can be found in our [Privacy Notice](#) available at [Oncology.Sumitomo-Pharma.com](#). If you have questions about this privacy notice, our data collection practices, or your rights, please complete this form. If you are unable to review or access this notice due to a disability, you may call 1-888-394-7377 to request this notice in an alternative format. You can also contact SMP Oncology's Data Protection Officer (DPO) with any questions about this notice, our data collection practices, or your rights. Individuals in the U.S. can reach the DPO at:

Sumitomo Pharma Oncology, Inc.
Attn: Data Protection Officer, Legal Affairs
84 Waterford Drive
Marlborough, MA 01752

APPENDIX A

SCOPE OF SUMITOMO PHARMA ONCOLOGY, INC. STATE APPLICANT PRIVACY NOTICE

This Applicant Privacy Notice applies only to information collected about California, Colorado, Virginia, Utah, and Connecticut Applicants. It provides information required under the California Consumer Privacy Act of 2018 and California Privacy Rights Act of 2020 (collectively, the “CPRA”), the Colorado Privacy Act of 2021 (the “CPA”), the Virginia Consumer Data Protection Act of 2021 (the “VCDPA”), the Utah Consumer Privacy Act of 2022 (the “UCPA”), and the Connecticut Data Privacy Act of 2022 (“CDPA”).