



# Privacy Notice for Recruitment

## 1. Introduction

At CEPI, we take the privacy of individuals and the protection of their Personal Data seriously in every country where we operate. We are committed to Processing Personal Data in a way that safeguards individual rights and complies with the principles of the GDPR, and all relevant national laws.

This Notice outlines how we collect, use, share, and protect your Personal Data during the recruitment process. To help us with this, it is crucial that the Personal Data you provide in your application is accurate and up to date.

If you have any questions about how we Process your Personal Data, or about this Notice, please email [privacy@cepi.net](mailto:privacy@cepi.net).

## 2. Data Controller

Depending on your location, the data controller will be one of the following (collectively referred to as **CEPI** or 'we'):

- (a) The Coalition for Epidemic Preparedness Innovations ("CEPI Norway"), with registered address at Askekroken 11, 0277 Oslo, Norway.
- (b) The Coalition for Epidemic Preparedness Innovations UK Limited ("CEPI UK"), with registered address at Henry Wood House, 4-5 Langham Place, London, England, W1B 3DG.
- (c) The Coalition for Epidemic Preparedness Innovations U.S. ("CEPI US"), with registered address at Suite 500, 5th floor, 1899 Pennsylvania Avenue NW, Washington DC 20006.

## 3. Key Definitions

The following terms are used throughout this Privacy Notice:

Term	Definition
<b>Associate</b>	Any non-Employee engaged to provide services to CEPI or chosen or appointed to act or speak on behalf of CEPI. This includes, but is not limited to: <ul style="list-style-type: none"><li>• paid consultants;</li><li>• temporary workers and individuals engaged through a professional employer organisation or other intermediary;</li><li>• external reviewers or other experts engaged by CEPI (paid or unpaid);</li><li>• interns and fellows (paid or unpaid); and</li><li>• members of CEPI's Board of Directors and advisory bodies (e.g., Scientific Advisory Committee, Joint Coordination Group).</li></ul>
<b>Candidate</b>	Any individual who has applied for, or been identified for, an employment or service opportunity with CEPI.
<b>Data Processor</b>	A third party that Processes Personal Data on behalf of CEPI, under our instructions.
<b>Employee</b>	Any individual with an employment contract directly with one of CEPI's three legal entities in Norway, the UK or the US.
<b>Personal Data</b>	Any information that directly identifies you or relates to you, that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data can be factual (for example, a name, email address, location or date of birth) or an opinion about your actions or behaviour.

Term	Definition
Processing	Obtaining, recording, organising, storing, amending, retrieving, disclosing and/or destroying information, or using or doing anything with it.
Special Category Data	Sensitive Personal Data, as defined in Article 9 of the GDPR and includes Personal Data relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying you, data concerning health, or data concerning sex life or sexual orientation.

## 4. What Personal Data We Will Process and Why

This section explains how we handle your Personal Data during the recruitment process. The Personal Data listed below is normally collected directly from you via your application, or during interviews. We may also collect Personal Data from third parties, such as recruitment agencies, publicly available sources (like LinkedIn), or from referees you have provided.

Below is an overview of the categories of Personal Data we may Process, along with the legal basis for Processing. The specific types of Personal Data we Process may vary based on legal requirements in Norway, the US, and the UK, and depending on the nature of the role you are applying for. The legal basis may vary depending on the data itself, the reason and methods of collection, and the specific reason for Processing.

For a comprehensive list of the Personal Data we Process to manage your relationship with us, please contact [privacy@cepi.net](mailto:privacy@cepi.net).

### 4.1 Application and Assessment Data

Purpose	Legal basis	Examples
To manage your application and communicate with you	a) Taking steps at your request prior to entering into a <b>contract</b> ; or b) CEPI's <b>legitimate interests</b> in managing its recruitment process.	<ul style="list-style-type: none"> <li>Contact details (name, address, email, phone number)</li> </ul>
To assess your suitability for the role and make hiring decisions	a) Taking steps at your request prior to entering into a <b>contract</b> ; or b) CEPI's <b>legitimate interests</b> in managing its recruitment process	<ul style="list-style-type: none"> <li>CV or application form</li> <li>Cover letter</li> <li>Professional and educational history</li> <li>Qualifications and skills</li> <li>Interview notes</li> <li>Information from references</li> </ul>
To conduct pre-employment screening and verify your information	a) CEPI's <b>legal obligation</b> to comply with applicable legal requirements (e.g., right-to-work checks); b) CEPI's <b>legitimate interests</b> in verifying candidate information.	<ul style="list-style-type: none"> <li>Proof of identity</li> <li>Right-to-work documentation</li> <li>Professional certifications</li> </ul>

Purpose	Legal basis	Examples
To review and manage potential conflicts of interest	a) CEPI's <b>legitimate interests</b> in ensuring our decision-making is free from undue influence.	<ul style="list-style-type: none"> <li>Conflict of interest declarations.</li> <li>Information on external engagements or financial interests.</li> </ul>

## 4.2 Special Category Data

Processing of Special Category Personal Data requires both a lawful basis under Article 6 of the GDPR (as described elsewhere in this Notice), and an additional basis under Article 9 of the GDPR, as set out below.

Purpose	Legal basis	Examples
To provide reasonable adjustments during the recruitment process (e.g., for an interview)	a) It is necessary for CEPI to carry out its <b>legal obligations</b> as a potential employer; or b) Your explicit consent.	<ul style="list-style-type: none"> <li>Disability status</li> <li>Specific health-related requirements</li> </ul>
To support our diversity and inclusion initiatives through anonymised statistical analysis	Your explicit consent.	<ul style="list-style-type: none"> <li>Ethnicity</li> <li>Racial origin</li> <li>Gender</li> <li>Sexual orientation</li> </ul>

## 4.3 Criminal Records Data

Purpose	Legal basis	Examples
To conduct pre-engagement verification, when disclosed (self-declaration only)	a) Specific legal authorisation under applicable national law (e.g., pre-engagement screening regulations); and either b) CEPI's <b>legitimate interests</b> in safeguarding its operations and staff; or c) CEPI's <b>legal obligations</b> , where required by law.	<ul style="list-style-type: none"> <li>Information about criminal convictions or proceedings</li> </ul>

## 4.4 Ensuring CEPI's or Third Parties' Rights

CEPI may Process Personal Data to establish, exercise, or defend legal claims. For example, in the event of a dispute arising from the recruitment process. The legal basis for this Processing is:

- Article 6(1)(f) of the GDPR where the Processing is necessary for the purposes of CEPI's **legitimate interests in protecting and asserting legal rights**; and

- Article 9(2)(f) of the GDPR where the Processing involves Special Category Data and is **necessary for the establishment, exercise, or defence of legal claims**.

## 5. Disclosure of Personal Data

We may share your Personal Data with third parties for the purposes set out in this Notice. We may, for example, disclose Personal Data to the following third parties:

**(a) Professional advisors**

For example, accountants, auditors, lawyers, pension providers, insurers, and other outside professional advisors.

**(b) Public and governmental authorities**

Entities that regulate or have jurisdiction over CEPI such as regulatory authorities, public bodies, and judicial bodies, including to meet national security or law enforcement requirements.

**(c) Investors and partner organisations**

For example, funders, sponsors, due diligence reviewers, and delivery partners, where necessary for governance, assurance, reporting, contracting, or programme delivery, and only to the extent required by contract or applicable law.

**(d) Service providers**

Companies that provide products and services to CEPI such as Applicant Tracking System (ATS) providers, background checking services, and external recruitment agencies.

When we use third-party service providers (Data Processors), we have contracts in place to ensure your Personal Data is protected.

## 6. Transfer of Personal Data outside the EEA/EU and UK

As a global organisation, your Personal Data may be accessed by CEPI staff, or transferred to service providers located outside the EU/EEA or UK. In such cases, we will ensure that the Personal Data is subject to appropriate safeguards, by means of transferring Personal Data to countries approved by the European Commission or ensuring other appropriate safeguards.

## 7. Retention of Personal Data

CEPI will retain your Personal Data only for as long as necessary to fulfil the purposes for which it was collected.

- If your application is successful**, your Personal Data will be transferred to your employee file and will be governed by the **CEPI Privacy Notice for Employees and Associates**.
- If your application is unsuccessful**, we will retain your Personal Data for a period of **6-12 months** after the hiring decision has been communicated to you. This is to allow us to defend against any potential legal claims related to the recruitment process.

We may ask for your **consent** to retain your Personal Data for a longer period to consider you for future suitable vacancies. You can withdraw this consent at any time.

## 8. Protection of Personal Data

CEPI will take appropriate technical and organisational measures to protect Personal Data that are consistent with applicable privacy and data security laws and regulations, including requiring service providers to use appropriate measures to protect the confidentiality and security of Personal Data.

## 9. Automated Decisions

CEPI does not envisage that you will be subject to decisions that will have a significant impact on you based solely on automated decision-making. We will notify you in writing if this position changes.

## 10. Your Rights

You have, in certain circumstances, the right to:

- (a) access your Personal Data;
- (b) correct inaccurate Personal Data;
- (c) have Personal Data erased;
- (d) restrict the Processing of your Personal Data;
- (e) receive Personal Data you have provided to CEPI in a structured, commonly used and machine-readable format for onward transmission (data portability); and
- (f) object to the Processing.

If the Processing is based on your consent, it will cease when you withdraw this consent and you may do so at any time. You also can file a complaint with your local data protection supervisory authority. However, we encourage you to address any objections against our Processing of Personal Data to us first.

If you wish to exercise any of your rights under this Notice, please contact us using the details provided below.

## 11. Contact Information

If you have questions related to CEPI's Processing of your Personal Data, this privacy policy or want to exercise any of your rights, please contact CEPI Privacy at [privacy@cepi.net](mailto:privacy@cepi.net).

## 12. Changes to this Notice

We will review this Notice as required. If we make any material changes in our Processing that may affect the exercise of our rights or freedoms, this Notice will be updated and made available to you.

Document Control	
Document Owner	Director of Governance, Risk and Compliance
Linked documents	Data Protection and Privacy Policy
Date of next review	February 2027