



## Global Data Privacy Notice for Employees and Candidates

This Data Privacy Notice (this “Notice”) explains what personal information Flatiron collects about you, how we use this personal information, and your rights with respect to this personal information. This notice applies to the handling of your personal information as an employee or a candidate for employment of Flatiron. Throughout this Notice, the term “Flatiron” means Flatiron Health, Inc. (“Flatiron US”), Flatiron Health UK Limited (“Flatiron UK”), Flatiron Health K.K. (“Flatiron Japan”), and Flatiron Health GmbH (“Flatiron Germany”).

To the extent this Notice conflicts with local law in your jurisdiction, local law controls.

### Categories of personal information we collect

In the context of your employment, or when evaluating your candidacy for employment at Flatiron, we may collect the following categories of personal information:

- **Direct identifiers** such as your name, email address, mailing address, phone number, and photo.
- **National identifiers**, such as your national ID/passport, citizenship status, residency and work permit status; social security number; or other taxpayer/government identification number.
- **Professional and/or employment details**, such as your job title/position, office location, employment contract, offer letter, hire date, performance history and disciplinary records, training records, and leave of absence information.
- **Beneficiary and dependent information**, such as names, contact information, social security numbers, and dates of birth.
- **Background information**, such as your professional qualifications, education, CV/resume, criminal records (for background screening and vetting purposes where permissible and in accordance with applicable law).
- **Financial information**, such as bank account details, tax information, salary, retirement account information, company allowances and other information necessary to administer payroll, taxes and benefits.
- **Information about your use of the internet, our network and our devices**, such as use of your work email account, the internet, our computers, phones and other devices to which you have access, and building access.
- **Demographic data**, on a voluntary basis. This may include data classified as “sensitive personal information” such as your gender, racial and ethnic origin, or information about your sexual orientation, health, disabilities, or gender identity. If you choose to provide



us with this information, we may process this data in order to (i) monitor and ensure diversity and equal treatment and opportunity; (ii) to provide work related accommodations or adjustments; (iii) to provide health information benefits to you and your dependents; and (iv) to manage absences from work.

We collect personal information directly from you or, when you have given us permission, from third parties. We will only use your personal information for the reasons we originally collected it or for other legitimate business reasons outlined in this Notice. If we ask you to provide personal information not described above, the reason for doing so will be made clear to you at the point of collection.

### **Our purposes for processing your personal information**

- **Hiring:** During the hiring process, we may process your personal information to assess your candidacy for employment, to contact you to discuss the position, to make an offer of employment and, if an offer of employment is made, to conduct certain background and reference checks, to the extent permitted in your jurisdiction.
- **To administer your employment contract.** We may use your personal information for purposes of managing our employment relationship with you and to fulfill our obligations under your employment contract, including on-boarding.
- **Compensation and benefits:** We may process your personal information to manage payroll, taxes, and benefits, as well as to process work-related claims and leaves of absence.
- **Performance reviews:** We may process your personal information to review how you are performing at work to help determine your work performance requirements and career development needs.
- **Legal requirements.** We may process your personal information to comply with laws and regulations (e.g., labor and employment laws, health and safety, tax, anti-discrimination laws) or to exercise or defend our legal rights.
- **Security & IT.** We may process your personal information to maintain the security of Flatiron's computing resources and premises; to provide services to you as necessary for your role, and to protect your safety.
- **Emergencies:** We may process your personal information to help us establish emergency contacts for you and to help manage emergencies, crises, and business continuity.
- **Investigations and disciplinary actions:** We may process personal information when necessary to investigate and support decisions on disciplinary actions or terminations, conduct grievance management, or when necessary to detect fraud or other types of wrongdoing.



- **DEI goals:** We may process your personal information as necessary to help us understand the diversity of our workforce and to support business diversity, equity, and inclusion initiatives.
- **To comply with the principles of Good Clinical Practice (GCP), such as ICH Guidelines:** We may collect and store the CVs, resumes, and other information regarding the professional and educational qualifications of Flatiron employees involved in clinical research.
- **Day-to-day business operations:** We may process your personal information for other legitimate purposes that are reasonably required for day-to-day operations at Flatiron, such as managing our relationships with employees, accounting, financial reporting, business analytics, employee surveys, operational and strategic planning, mergers and acquisitions, business travel, and expense management.

### How and why we share your personal information

Flatiron will only share your personal information with those who have a legitimate business need for it. Whenever we permit a third party to access your personal information, we will ensure it is used in a manner consistent with this Notice, including for the following purposes:

- In order to carry out the purposes of our processing activities described in the section above entitled “Our purposes for processing your personal information”;
- To enable third parties to provide services to Flatiron (e.g., insurance providers, payroll support services, travel management services, legal service providers, security services; and background check providers, to the extent permissible in your jurisdiction);
- In response to lawful requests by public authorities (e.g., regulatory bodies; law enforcement authorities);
- As necessary to establish, exercise, or defend against potential, threatened, or actual litigation;
- Where necessary to protect Flatiron or your vital interests, such as for safety and security purposes;
- In connection with the sale, assignment or other transfer of all or part of our business; or
- With clinical trial sponsors to the extent required to demonstrate compliance with GCP principles (e.g., sharing CVs/resumes of Flatiron employees involved in a specific clinical research project);
- Otherwise in accordance with your consent.



We do not sell your personal information or share your personal information for the purpose of behavioral advertising and we do not allow any personal information to be used by third parties for their own marketing purposes.

### **How long do we retain your personal information**

**Employees:** We will keep your personal information for as long as we need to carry out the purposes for which it was collected or as otherwise required by law. Generally, this means we will keep your personal information until the end of your employment, plus the period of time required by the law of the country you are employed in or a reasonable period of time to respond to any inquiries, deal with legal, tax, accounting or administrative matters, or to provide you with ongoing benefits. We will delete your personal information once we no longer have a legitimate business need or legal requirement to process it.

**Applicants:** If your application is successful, we will retain your personal information as described above in the employee section. If your application is not successful, we will store your application data in our internal talent relationship management system as follows:

- United States - 3 years
- Japan - 3 years
- United Kingdom - 12 months
- Germany - 6 months

### **Flatiron Contact Information**

You can contact us with questions about this Notice, your privacy rights, and our privacy practices more generally at:

Flatiron Health  
233 Spring Street  
NY, New York 10013  
[privacy@flatiron.com](mailto:privacy@flatiron.com)

### **Supplemental Information for employees and candidates in the United Kingdom and the European Union**

In addition to the information shared above, employees and candidates located in the European Union and the United Kingdom have certain rights under applicable data protection laws, including the EU and UK General Data Protection Regulations (collectively, the “GDPR”) and local laws implementing or supplementing the GDPR.

Subject to the statutory requirements, the fulfillment of which must be assessed on a case-by-case basis, you have the following rights with regard to the processing of your personal information:

1. Request access to and obtain a copy of your personal information;



2. Request rectification or correction of your personal information you have provided that is inaccurate;
3. Request deletion of personal information that is no longer necessary to fulfill the purpose for which it was collected, or does not need to be retained by Flatiron for other legitimate purposes;
4. Restrict or object to the processing of your personal information and;
5. If applicable, request your personal information be transferred to another company.

Application of these rights may vary depending on the type of data involved and Flatiron's basis for processing the personal information. We will consider and act upon any requests in accordance with applicable data protection laws. We may request specific information from you to enable us to confirm your identity and right to access, as well as to locate the personal information that we hold about you.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note, however, that this will not affect the lawfulness of the processing before withdrawal of consent.

To make a request to exercise one of the above rights, please contact us at [privacy@flatiron.com](mailto:privacy@flatiron.com) or reach out to the Data Protection Officer in your jurisdiction, as listed below in the section entitled "Identity and contact details of the data controller."

In the event you have a concern regarding our compliance with GDPR, you have the right to lodge a complaint with the relevant supervisory authority in the EU and/or UK.

### **Identity and contract details of the data controllers**

**United Kingdom:** Flatiron UK and Flatiron US are joint controllers of personal information processed for employees and candidates for employment at Flatiron UK.

Flatiron Health UK Limited  
Ivy House, 107 St. Peter's Street,  
St. Albans, Hertfordshire  
AL1 3EW

Flatiron Health, Inc.  
233 Spring Street  
5th Floor  
New York, NY 10012

**Data Protection Officer**  
Kaleidoscope Consultants (dpo.flatiron@kdpc.uk)  
East Side, Kings Cross  
London N1C 4AX  
United Kingdom

**Germany:** Flatiron Germany and Flatiron US are joint controllers of personal information processed for candidates for employment at Flatiron Germany

Flatiron Health GmbH  
Richmodstrasse 6

Flatiron Health, Inc.  
233 Spring Street



50667 Cologne  
Germany

5th Floor  
New York, NY 10012

Data Protection Officer  
ISICO Datenschutz GmbH  
Am Hamburger Bahnhof 4  
10557 Berlin  
Germany

## **Legal basis for processing**

We collect and process your personal information to carry out our employment contract with you, to comply with our legal obligations or exercise rights in the field of employment, or where the processing is in our legitimate interests, provided this is not overridden by your data protection interests of fundamental rights and freedoms. Examples of our legitimate interests are listed above in the section entitled “Our purpose for processing your personal information.” In certain situations, we also rely on your consent - for example, when we process your sensitive personal information related to your current health status or your demographic information.

## **Transfer of data outside the European Economic Area (EEA)**

In order to fulfill the processing activities listed above in the section entitled “Our purposes for processing your personal information” Flatiron UK and Flatiron Germany will transfer your personal information to Flatiron US and may store certain of your personal information in the United States.

Countries outside the EEA may not provide for a level of data protection comparable to European data protection law. We take precautions in order to ensure adequate protection of your personal information in these countries. For this purpose, Flatiron US, Flatiron Germany and Flatiron UK have entered into a contract containing the EU Standard Contractual Clauses to ensure an adequate level of data protection. Flatiron US enters into contracts containing the EU Standard Contractual Clauses with all third party data processors that process personal information in order to conduct the recruitment and application process.

## **Supplemental Information for employees and candidates in Japan**

In processing your personal information, Flatiron may transfer your personal information outside Japan including to countries where the standards of data protection imposed by law may not be the same as Japan. By submitting your application for employment or signing your employment letter, you: (i) explicitly consent to the processing and export of such data; (ii) acknowledge and agree that you have received a copy of the Notice, have read it thoroughly, have had the opportunity to ask questions, and understand and agree to the processing of your personal information in accordance with this Notice.



## Supplemental Information for employees and candidates in California

If you are an employee or candidate that resides in California, in addition to the information shared above, you have certain rights regarding your personal information under the California Privacy Rights Act (“CPRA”).

Flatiron does not sell your personal information or share such information for cross context behavioral advertising. As described above, we may share certain personal information between our offices and other third parties, including service providers who provide services to Flatiron.

You may request notice of and access to the following information over the past 12 months:

- Categories of personal information we collected about you;
- Categories of sources for personal information we collected about you;
- Business or commercial purposes for collecting or sharing your personal information;
- Categories of third parties to whom we disclosed personal information;
- The specific pieces of personal information we collected about you;
- If we disclosed your personal information for a business purpose, a list of disclosures identifying the personal information categories that each category of recipient obtained.

We will take steps to verify your identity before processing your request to exercise these rights. Note that none of these rights are absolute and there may be circumstances in which we are required or permitted under law not to address your request. We will not penalize you for exercising any of your rights.

You may exercise your rights under the CPRA through one of the following means:

- Email us at [privacy@flatiron.com](mailto:privacy@flatiron.com)
- Call our toll free number at 888-662-6367