

RECRUITMENT CANDIDATE PRIVACY NOTICE

INTRODUCTION

This Privacy Notice for the Bicycle Therapeutics group sets out the categories of your personal data we collect, how we collect it, what we use it for and with whom we share it, in accordance with applicable data protection legislation, including the General Data Protection Regulation (**GDPR**).

By **personal data** we mean any information relating to you such as your name, contact details. Personal data does not include data which has been anonymised, such as data from equal opportunities monitoring carried out on an anonymised basis.

If your application is for a job based in the UK, BicycleTx Limited will be the **data controller** in respect of the processing of your personal data and in this Privacy Notice “Bicycle”, “we”, “us” or “our” refers to Bicycle Tx Limited.

If your application is for a job based in the US, Bicycle Therapeutics, Inc. will be the **data controller** in respect of the processing of your personal data and in this Privacy Notice “Bicycle”, “we”, “us” or “our” refers to Bicycle Therapeutics, Inc.

The data controller is responsible for deciding how personal data about you is used.

Should you have any questions about this Privacy Notice you can contact us using the details set out in the ‘Contact Us’ section below.

This Privacy Notice applies to personal data about you that we collect, use and otherwise process in connection with our recruitment, and if applicable, our offer and on-boarding processes. We do not require you to provide any special categories of personal data (as defined below), other than as set out below. We would recommend that you do not include any additional special categories of personal data in your application as it is unlikely to be relevant to the application process.

HOW DO WE COLLECT INFORMATION ABOUT YOU AND WHAT DO WE USE IT FOR?

We set out below the types of personal data about you which we may collect or create at each stage of the recruitment process. In each case we have specified the purpose for which we use the relevant personal data and our ‘lawful basis’ for processing it. The law specifies certain ‘lawful bases’ for which we are allowed to use your personal data. Most commonly, we will rely on one or more of the following lawful bases for processing your personal data:

- where it is **necessary for the performance of the contract**;
- where it is necessary for **compliance with a legal obligation** to which we are subject; and/or
- where it is necessary for the purposes of the **legitimate interests** pursued by us or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of our recruitment candidates, which require their protection.

Where relevant, we have considered whether the interests or fundamental rights and freedoms of our recruitment candidates override our legitimate interests and have formed the view that they do not.

Application and assessment process

In connection with assessing your application we process the following categories of personal data (see also the section entitled 'Special categories of personal data' below):

- **Information we collect from you at the application stage**

We collect the personal data that you provide to us in your CV and covering letter. It is for you to decide what you include in these documents. However, the kinds of information you may wish to include are: name, contact details, details of your qualifications and information about your employment experience.

- **Information we collect from you in the course of interviews**

If you are invited to undertake further assessments (such as an interview) in connection with your application and you participate in such assessments, we may collect further personal data that you provide to us as part of that process. The kinds of information you may disclose, include information about your qualifications and information about your employment experience. You may choose to disclose salary history or salary expectations.

- **Information we create ourselves**

Throughout the recruitment process, we may create personal data in connection with the assessment of your application. For example, we may record the views of those considering your application about your suitability for the role for which you have applied and retain interview notes. We may contact the individuals whose names you provide to us and record their views on your previous performance and on your suitability for the role for which you have applied and retain notes of these conversations. We may also reach out to individuals in our network who may know you and record their views on your previous performance and your suitability for the role for which you have applied and retain notes of these conversations.

We may use your name and contact details to contact you in connection with your application, such as to invite you to undertake further assessments or to make you an offer of employment. We have a legitimate interest in facilitating the interview process and communicating offers of employment to you.

We may use the information we collect as part of the application and assessment process and the information that we create ourselves in connection with the assessment of your application for the purpose of assessing your suitability for the role for which you have applied. We have a legitimate interest in making informed recruitment decisions and selecting suitable candidates for roles with us.

If your application is successful

If your application is successful we will collect further personal data about you as set out below (see also the section entitled 'Special categories of personal data' below):

- **Background checking**

We will undertake background checks, for example: obtaining evidence of employment from previous employers, verifying academic records and, for UK employees, requesting a copy of your P45. We will use the personal data contained in such documents to verify the details

provided by you in the recruitment process. We have a legitimate interest in maintaining standards of integrity and excellence in our workforce.

- Identification information

We will collect copies of identification documents from you (such as your passport or driving licence, proof of address, a copy of your work permit (where applicable), a photograph and a copy of your signature). We use this information to comply with immigration requirements and to verify your identity for our own internal security purposes. This personal data is required for us to comply with our legal obligations and for the performance of your employment contract with us.

SPECIAL CATEGORIES OF PERSONAL DATA

There are more limited bases for processing special category personal data. This is personal data which reveals or contains:

- racial or ethnic origin
- political opinions
- religious and philosophical beliefs
- trade union membership
- genetic data
- biometric data
- health data
- sex life or sexual orientation

We will process special category personal data because we have a lawful basis for doing so and because it is necessary:-

- for the purposes of carrying out our obligations and exercising specific rights in the field of employment and social security law (**employment law obligations**); and/or
- for the assessment of the **working capacity** of a successful candidate.

However, we may also process special category data because: it is necessary in relation to **legal claims**; it is necessary for reasons of substantial **public interest** or, in limited circumstances, you have given explicit consent.

The special categories of data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our ‘lawful basis’ for processing it.

Category of special categories of personal data	Examples	Purpose	Lawful basis for processing
Medical/health information as part of the application process	Information re any mental or physical impairment which may cause a disadvantage to you during the recruitment process	To enable us to make any appropriate reasonable adjustments	Compliance with a legal obligation/employment law obligations
Immigration	Passport, visa, work	To demonstrate right	Compliance with a legal

information (successful candidates only)	permit	to work in the UK	obligation/employment law obligations
Medical/health information (successful candidates only)	Pre-employment provision of medical information	To ascertain medical information that may be relevant to the role and/or the need for any reasonable adjustments	Necessary for performance of contract/compliance with a legal obligation & employment law obligation/working capacity

WHAT IF YOU DO NOT PROVIDE THE PERSONAL DATA WE REQUEST?

If you do not provide us with certain information when requested, it may impact our ability to assess your suitability for a role with us or we may not be able to make you an offer of employment.

CHANGE OF PURPOSE

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

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

WITH WHOM WILL WE SHARE YOUR INFORMATION?

We may share your personal data with third parties where this is required by law, where it is necessary to perform our contract with you, or where we have another legitimate interest in doing so.

Other members of our corporate group

We are part of a group of companies (the “Bicycle Therapeutics Group”) that includes Bicycle Therapeutics Limited, BicycleTx Limited, BicycleRD Limited and Bicycle Therapeutics, Inc.

Certain functions of the Bicycle Therapeutics Group are centralised and conducted by members of the Bicycle Therapeutics Group other than us. We have a legitimate interest in benefiting from such centralisation and the services provided to us (as our data processor) by other members of the Bicycle Therapeutics Group. For example, other members of the Bicycle Therapeutics Group may assist in the recruitment process and may receive personal data in connection with such assistance.

We may also share your personal data with other entities in the Bicycle Therapeutics Group in the context of a business reorganisation or group restructuring exercise, for system maintenance support and for hosting of data.

Our service providers

We share personal data with Bicycle Therapeutics Group’s third-party service providers that perform services and functions at our direction and on our behalf. Our service providers are our IT service

providers, our recruitment service providers and our lawyers. We rely on service providers in order to effectively operate our business.

Third party companies associated with a sale or acquisition of the business

In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets

If all or any of our group companies or substantially all of their assets are acquired by a third party, in which case personal data may be one of the transferred assets.

Other third parties

We may need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process. We may disclose your personal data if we are required by law to do so or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or another legal process. We may share your personal data where this is required by law, where it is necessary to perform our contract with you, or where we have another legitimate interest in doing so.

PROCESSING OF YOUR PERSONAL DATA OUTSIDE THE EEA

Bicycle Therapeutics, Inc is located in the US. The European Commission has not determined that the US ensures an adequate level of protection for personal data. We have put in place standard contractual clauses approved by the European Commission to ensure that appropriate safeguards are in place in respect of personal data that is transferred from members of the Bicycle Therapeutics Group in the EU and Bicycle Therapeutics, Inc. You may obtain a copy of the standard contractual clauses by sending us a request in writing (refer to Contact US section below). When we transfer information from the EEA to the USA, the transfer is made using an encrypted channel to Microsoft's servers, whether using Outlook, a web browser or a mobile.

Certain third-party service providers such as our recruitment service providers and IT providers may also be located in the US. If we share your personal information with any service providers located in the US, we will require such service providers to respect the security of your data and to treat it in accordance with the law. Thereby, you can expect a similar degree of protection in respect of your personal information.

We may need to share personal data with our lawyers in connection with taking legal advice. Our lawyers may include individuals located in both the US and the EU.

WHERE WE STORE YOUR PERSONAL DATA

The Bicycle Therapeutics group of companies has operations in the USA and in the EU. All information you provide to us will be stored on our secure servers. Once we have received your information, we will use appropriate technical and organizational measures to prevent unauthorised access, disclosure, loss or damage to your personal data.

HOW LONG WILL WE RETAIN YOUR INFORMATION?

We will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

If you are successful in your application, we will retain the majority of the categories of personal data set out above for the duration of your working relationship with us and for a reasonable period of time after its termination as described in our employee privacy policy which will be made available to you once you become an employee. If you are unsuccessful in your application, we will retain the majority of the categories of personal data set out above for a reasonable period of time (no longer than twelve months) after the recruitment process has ended unless you have consented to us keeping it longer.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your personal data for the purposes for which it is processed, we will securely destroy your personal data in accordance with applicable laws and regulations and in accordance with our records retention policy.

ACCURACY OF INFORMATION

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data changes during the recruitment process.

YOUR RIGHTS IN RELATION TO YOUR INFORMATION

Where the processing of your personal data is subject to the GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request **access** to your personal data (commonly known as a “data subject access request”) and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data; and
- request the **transfer** of your personal data to another party.

If you want to exercise one of these rights please contact using the contact details set out below. You also have the right to make a complaint at any time to a data protection supervisory authority. The Information Commissioner’s Office is the UK supervisory authority for data protection issues.

Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal data is not disclosed to any person who has no right to receive it.

FURTHER INFORMATION

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact us.

CONTACT US

<p><u>Bicycle Tx Limited</u></p> <p>info@bicycletherapeutics.com</p> <p>BicycleTX Limited; Attention COO B900, Babraham Research Campus Cambridge, UK CB22 3AT</p>	<p><u>Bicycle Therapeutics, Inc.</u></p> <p>info@bicycletherapeutics.com</p> <p>Bicycle Therapeutics Inc; Attention: Office Manager 4 Hartwell Place Lexington 02421-3122 USA</p>
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