

Privacy Notice for Healthcare Professions

Last Updated: July, 2024

This Privacy Notice is addressed to all Healthcare Professionals ("HCP") that engage with Dr. Reddy's Laboratories Limited and/or its subsidiaries and affiliates.

Dr. Reddy's is responsible for the processing of your personal information as it decides why and how it is processed, thereby acting as the "Data Controller". It may exercise this responsibility alone or jointly with other of Dr. Reddy's affiliates and subsidiaries, acting as "co-controller(s)". In this Privacy Notice, "Dr. Reddy's", "we", "our" or "us" refers to Dr. Reddy's and/or its affiliates and/or subsidiaries who you directly engage with.

For the scope of this data privacy notice ("Notice"), HCP refers to a member of the medical, dental, pharmacy or nursing professions, a key opinion leader or any other person who, in the course of their professional activities, may prescribe, recommend, purchase, supply, sell or administer a pharmaceutical product or service of Dr Reddy's (hereinafter referred to as "you").

We value your privacy and are committed to ensuring that any personal information we receive is processed and protected in accordance with applicable data protection laws as well as with Dr. Reddy's policies and standards.

Please read this notice carefully since it sets out what personal information that relates to you directly or indirectly, we are processing and why. It also informs you of your privacy rights and how to exercise them. We are committed to keeping you fully informed about our activities involving the processing of your personal information pertaining to your engagement with us.

1. What personal information do we collect?

In the context of the above described, we process personal information that is collected directly from you or is collected from third-party sources. We also generate information about you or related to you, based on the information we collect during the course of our engagement with you. This is further described in detail below.

1.1 Personal Information we collect directly from you:

- **contact and general identification information** e.g., name, signatures, date of birth, national identification numbers, email and/or postal address, fixed and/or mobile phone number, and if required to fulfil our contractual obligations with you, your passport and visa information.
- **electronic identification and systems access data** when you use one of our digital platforms or to attend an event Dr Reddy's is associated with, (e.g., your username, password, IP address, online identifiers/cookies, system login and activity logs, access and connection times, pictures or videos, physical location).
- **your professional information** e.g., title, professional and/or educational qualifications, speciality, associated organisation(s), educational/professional affiliations, any applicable registration numbers, academic publications, past congress activities, participations/expertise in past clinical trials, editorial board participations, and any other information included in your resume or that you choose to provide when engaging with us.
- **your financial and background information** where necessary, your payment information, including bank account details, taxpayer registration/identification details (e.g. PAN, TIN, RG, CPF, PIS etc.), cancelled cheques, and any other information we are legally required to collect for the purposes of our engagement.
- **Voluntarily disclosed personal information:** which we will also collect when you willingly disclose such information during your interactions with our representatives, including but not limited to information about your experiences with our products and services, information related to the promotional material we may share, and scientific and/or medical activities you engage in.

1.2 Third-party sources through whom we collect your personal information:

- Organisations with whom you work (e.g. hospitals, clinics, educational universities)
- Data Companies providing information services in the healthcare sector (e.g. IQIVIA, Medpages etc.)
- Other Health Care Providers or Key Opinion Leaders in the same industry
- Event organisers and agencies
- Your patients, with whom you share your personal information
- Our social media pages when you interact with us
- Any other agencies with whom you share your personal information with the understanding that they will share it with us
- Trusted public sources

1.3 Personal Information we passively collect, generate or retain:

- Unique IDs assigned to you as part of our internal records
- Your preferred modes of communication or receiving information from us
- Academic topics that you are interested in and want to engage with on our platforms
- Products and services of Dr. Reddy's that you may be interested in based on your previous preferences
- Content that you prefer to receive, or view based on your interactions with us and your browsing experience with Dr. Reddy's platforms
- Any future interactions or events that you may show interest in, based on your specialty, location and past preferences.

Please note that where you provide personal information of other individuals such as your co-workers, other HCPs in your network, or in some cases your patients, you have the duty to ensure that you have directed them to this Notice and/or have their informed consent to share their information with us (as applicable).

Also note that when you engage with us through our or a third-party digital platform (such as a website or an application), any processing of your personal information will also be governed by the terms and policies of that platform. Please visit the Privacy section of such platform(s) to know more.

If you share personal information of a minor with us in relation to reporting of a safety or quality issue, any queries related to any of our products, or in any other capacity, you represent that you have the necessary lawful authorization to do so and can demonstrate the same upon our request.

2. For which purposes do we use your personal information?

2.1 Purposes of processing your personal information

We always process your personal information if it is relevant and necessary to achieve specific and legitimate business purpose(s). Such processing may involve one or more of the following purposes:

- **To manage our overall relationship with you**

We will do this by:

- Maintaining a database of your preferences as indicated by you through valid consents.
- Responding to your queries and sharing requisite information with you as per your requirements or requests.
- Sharing promotional and educational material with you on disease areas, our products and services, and other content that you may find interesting as per your area of expertise. We will share this information with you during our representatives' personal interactions with you or through SMS, Email, WhatsApp, or other such preferred communication channels which help enable our continued engagement.
- Reaching out to you on your special occasions and festivals to exchange courtesies.
- Enabling your use of our digital platforms that you visit, register for, or subscribe to.

- Taking steps that will help us fulfill our contractual obligations towards you. Such steps may include implementing any pre-contractual obligations or contract renewal activities (such as RFI's and due diligence assessments).
- Enabling billing and invoicing processes, when applicable.
- **To improve our future engagement with you**
We will do this by:
 - Periodically sending you surveys and questionnaires to gather your opinions and insights on the medical field or your professional experience.
 - Inviting you to events (e.g. medical/speaker events and conferences) organized or sponsored by Dr. Reddy's and where applicable, to process travel and accommodation arrangements for such events.
 - Engaging with you during third party events or conferences.
- **To enable us to organize events for you or to promote continued medical education**
We will do this by:
 - Engaging with you to seek or enable your participation in our public health and/or welfare initiatives related to specific products, disease areas or health and wellness themes.
 - Identifying, selecting and collaborating with you on medical, scientific, medico-marketing programs, public health/interest campaigns and other HCP centric engagements.
 - Sponsoring you as a delegate or faculty for national or international events and conferences organized by third parties, if permitted by local laws and/or industry codes.
 - Recording your participation and contribution at our events as delegates or speakers (physical and/or virtual) and further disseminating the knowledge you shared amongst other HCPs. Such events will include seminars, webinars, continued medical education, and advisory boards.
- **To help us optimize and personalize your experience with us**
We will do this by:
 - Analyzing the information, we collect during our interactions with you through multiple channels and further creating personalized internal records. This will help us understand your specific interests and needs, including your preferences in engaging with us.
 - Verifying and updating your personal information to ensure accurate archiving and record keeping.
 - Analyzing the information, you consent to providing us when using our digital products, such as cookies, click rating, content preferences etc.
 - Analyzing any other information we have collected about you from you or through third-party sources, to help us plan, manage and improve the quality of our interactions, services and communications with you.

Note: Where necessary, we may also use your personal information in an aggregated or anonymised form or in a manner where you cannot be directly identified for these purposes.

- **To collaborate with you on medical initiatives undertaken by us**
We will do this by:
 - Collaborating with you, acting as an investigator, on clinical trials or research initiatives sponsored by Dr. Reddy's.
 - Enabling your participation in patient support programs organized or supported by us.
 - Collaborating with you on any future academic engagements related to the above.
- **To comply with our legal obligations**
We will do this by:
 - Ensuring transparency on any transfer of value by creating evidence of transactions between us, where applicable (e.g. by maintaining audit records including recordings of the event (in photograph or video form), attendance sheets, consent statements, financial statements etc.)

- Resolving, processing and submitting reports to local authorities on adverse events or complaints due to quality concerns or other safety issues relating to our products and services. To better understand how we process personal information for this purpose, please visit our Pharmacovigilance Privacy Notice [here](#).
- Complying with any additional applicable laws, regulations, court orders, regulatory obligations or other legal requirements.
- **To preserve our Company's interest, without unduly affecting your privacy rights**
We will do this by:
 - Managing our IT resources, including our databases, infrastructure and tools that promote business continuity.
 - Preserving the company's interests by ensuring compliance with our additional obligations such as our internal policies, that of our licensors and suppliers, our contractual obligations, any tax related obligations
 - Preventing or managing alleged cases of misconduct or fraud through conducting audits and investigations.
 - Defending or initiating any litigation matters that involve the Company's interests.
 - Undertaking and completing mergers and acquisitions, in-licensing/out-licensing and divestments involving our company or affiliates.

2.2 Legal basis for processing your personal information,

We will not process your personal information if we do not have a legitimate business purpose and a legal basis as per the applicable laws for the purposes listed above. Therefore, we will process your personal information only if one or more of the following legal basis are applicable, based on our engagement with you:

- **If you consent to such processing:** If you freely provide your consent to Dr. Reddy's or to a third party for us to process your personal information in accordance with this privacy notice or any other supplementary/platform privacy notice that governs our data processing practices.
- **If we rely on legitimate uses for processing your personal information:** If the processing is necessary for the specified purpose for which you have voluntarily provided your personal information, and in respect of which you have not indicated to us that you do not consent to the use of your personal information. For e.g. if you choose to subscribe to one of our platforms, we will use your personal information to contact you about your subscription and to enable your activity on our platform.
- **If we need to execute a contract with you:** If the processing is necessary for the execution and performance of a contract that we have signed (for e.g. where we pay you an honorarium based on services provided by you for one of our events, we will have to process your financial and travel related information).
- **If the processing is necessary for our legitimate interests:** We will process your personal information for our legitimate interests, only if it does not unduly affect your interests or fundamental rights and freedoms. Examples of such processing activities include:
 - to offer you information on our products, services and other initiatives.
 - to implement and improve our company's policies related to our engagement financial processes involving you,
 - to manage our internal resources (including our IT infrastructure), deploy cost effective solutions, and optimize our interactions with you,
 - to meet our sustainability objectives and corporate social responsibilities,
 - to get your opinion and insights, as a subject matter expert, on our products and services,
 - to develop trust based professional relationship with you,
 - to prevent misuse, fraud, unethical or criminal activities related to our products and services, including security of our office premises, IT systems and infrastructure.

- to undertake divestments, mergers and acquisitions, licensing & distribution activities involving our company, etc.
- **If we need to comply with our legal or regulatory obligations**
- **If we process your personal information for public interest, based on applicable laws, or for our compliance with any judgment or decree, or order issued under any law.**

3. Who has access to your personal information and to whom is your personal information transferred?

3.1 Who will we transfer your personal information to:

We will not share, or otherwise transfer your personal information to recipients or third parties other than those indicated in this Privacy Notice.

During the course of our activities and for the same purposes as those listed in this Notice, your personal information can be accessed by, or transferred to the following categories of recipients or third parties, on a need-to-know basis to achieve such purposes:

- our personnel (including personnel, departments or other affiliates of Dr. Reddy's),
- our service providers, including banks and financial institutions, that provide services and products to us, at our behest or on our behalf,
- our business partners who offer products or services to or jointly with us or our subsidiaries or affiliates or with whom we may collaborate for development, distribution or marketing of products or services,
- our IT systems providers, cloud service providers, database providers and consultants, who we have engaged to facilitate the recruitment and onboarding process.
- any third party to whom we assign or novate any of our rights or obligations or sell or license our products and assets; and
- our advisors, auditors, consultants and external lawyers who have been engaged in the interest of our business.

3.2 Purposes for sharing or transferring your personal information:

- **To obtain services from third parties:** We may share personal information you share with us or that we may obtain under these terms to selected service providers or consultants acting on our behalf that may assist us in our business. Such activities will include:
 - performing data analysis,
 - providing customer relation management services,
 - providing IT or related infrastructure,
 - providing communication or reach out services, and
 - improving our sales and marketing process.
- **To comply with our regulatory and legal obligations:** Your personal information can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation, or at their request.

Where so required by local law or code of conduct or other industry affiliation, we may make public disclosures of the details of transfer of value that you may receive from Dr Reddy's on our websites or that of industry associations or relevant government authorities.

- **To protect the safety, rights and property of our company or others:** We may disclose your personal information to a third party, when necessary to protect the safety, rights and property of our company, our customers, employees and affiliates.
- **To prepare for or implement any change in the structure of our business:** We may process your personal information towards the preparation or implementation of reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock.

The above third parties acting on our behalf are contractually obliged to protect the confidentiality and security of your personal information, in compliance with applicable law and our policies and standards. Please note that where you consent to use third-party communication channels such as WhatsApp to interact with us, the relevant data processing terms of the channel will apply e.g. when you share your information with us on WhatsApp, their Business terms will apply which can be found [here \(https://www.whatsapp.com/legal/business-terms/\)](https://www.whatsapp.com/legal/business-terms/).

Cross-Border Transfer

The personal information we collect from you may also be processed, accessed, or stored in a country outside the country where we are located, which may not offer the same level of protection of personal information. We ensure that transfers to another affiliate or subsidiary of Dr. Reddy's take place only after ensuring compliance with applicable laws and that your information is always protected in line with our global policies and standards.

If we transfer your personal information to external companies in other jurisdictions, we will make sure to protect your personal information by (i) applying the level of protection required under the local data protection/privacy laws applicable to us and to the processing of your data (ii) acting in accordance with our policies and standards and, (iii) for our entities located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), unless otherwise specified, only transferring your personal information on the basis of standard contractual clauses, or other secure and lawful methods for transfer, approved by the European Commission. You may request additional information in relation to international transfers of personal information and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section no. 6 below.

4. How do we protect your personal information?

We have implemented appropriate technical and organisational measures to provide an adequate level of security and confidentiality to your personal information.

The purpose of these measures is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access and against other unlawful forms of processing.

5. How long do we store your personal information?

We will only retain your personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements. Our purpose for collection of data extends for as long as you choose to engage with us.

6. What are your rights and how can you exercise them?

Whenever we process personal information, we take reasonable steps to keep your personal information accurate and up to date for the purposes for which they were collected. We will provide you with the ability to exercise the following rights under the conditions and within the limits set forth in the applicable local laws.

- the right to be informed about what personal information we have about you and how we process your data,
- the right to access your personal information as processed by us and, if you believe that any information relating to you is incorrect, obsolete, or incomplete, to request its correction or updating.
- the right to erasure of your personal information or the restriction thereof to specific categories of processing,
- the right to withdraw your consent at any time, without affecting the lawfulness of the processing before such withdrawal,
- the right to object, in whole or in part, to the processing of your personal information. With certain exceptions, this includes the right to object to direct marketing and the right to object to your data being used for research,
- the right to grievance redressal for any grievances you may have related to the way your personal information is processed,

- the right to nominate another individual to exercise your privacy rights on your behalf in case of your death or inability to do so,
- the right to request its portability, i.e., that the personal information you have provided to us be returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format without hindrance from us and subject to your confidentiality obligations, and
- the right to object to automated decision-making including profiling, i.e., you can request a human intervention in any automated decision-making process related to processing of your data and where such processing is not based on your consent, authorised by law or necessary for the performance of a contract.

To ensure that your personal information remains up to date and accurate, you may review or update your personal information by reaching out to your Dr. Reddy's representative or when using our digital platform, through the relevant tools made available on the platform. The mode of exercising your data privacy rights may vary for some of our platforms. Please refer to the independent privacy notice of each Dr. Reddy's service or platform that you use.

You can also exercise the above rights by sending an email to our Data Privacy Officer at dataprivacy@drreddys.com. In case you are not satisfied with how we process your personal information you can also address your concern using this email Id and your concern will be investigated and redressed by our Data Privacy Officer.

Please note that when you send us a communication through this channel, we may request a scan of your identity card for identification purpose, it being understood that we shall only use such data to verify your identity and shall not retain the scan after completion of the verification. When sending us such a scan, you should make sure to redact your picture and national registry number or equivalent on the scan.

If you still do not receive a resolution for your grievance, you also have the right to file a complaint with the competent data protection authorities, in addition to your rights above.

7. How will you be informed of the changes to our Privacy Notice?

We may change or update this notice from time to time by posting a new privacy notice on our website (www.drreddys.com). Please keep checking this notice occasionally so that you are aware of any changes.