

Privacy Notice for Job Applicants and Prospects

Last Updated: November 2024

Dr. Reddy's Laboratories Ltd. ("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 fully owned subsidiaries, acting as "co-controller(s)". In this Privacy Notice, "we" or "us" refers to Dr. Reddy's and its affiliates and fully owned subsidiaries.

For the scope of this data privacy notice ("Notice"), job applicants or prospects mean individuals who apply to an open position with us, or who are contacted for or express interest in employment with us, or who attend a recruitment event or undergo an interview or assessment with us. This includes prospective employees and interns (will be further referred in this Notice as "you").

If you are a candidate based in USA or Canada, please also refer to the CCPA and Quebec Notice for Job Applicants and Prospects by clicking [here](#).

If you are a candidate or applicant based out of Brazil, please also refer to the Brazil Privacy Notice [here](#). Excluding the points mentioned in the Brazil specific notice, the remaining sections of the Privacy Notice as also applicable to Brazilian Residents.

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 information 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 talent management, scouting, assessment and acquisition activities and application, in general, for positions with us.

1. What personal information do we collect from you?

In the context of the above described, we will only process personal information that is relevant to you as a job applicant or a prospect, which in some cases might require key strategic validations for skills and professional standing.

We mainly collect personal information directly from you when you apply for a job in our application management system or when you participate in an interview or assessment. In such cases, we will act as a Data Controller of your personal information.

We can also obtain information from professional social networks, such as LinkedIn or other job boards, and from other publicly accessible sources (only information relevant to your professional life) for the purposes of actively approaching you with job opportunities. Should we not have already received your agreement to hold your data, on our initial contact with you, we will ask for your consent to hold your data only post which we will proceed with your candidature.

We may also receive personal information when you apply for an open position with us through the third parties like recruitment agencies or consultants. In such cases, the third party may also act as a Data Controller of your personal information. To exercise your data protection rights for the processing activities carried out by such third parties; you may need to contact the third party through which you have applied for a position with us. We may also receive your personal information (name, email address and your resume) when our employee has referred you for a position with us as part of our employee referral program. In such cases, you are notified that you have been referred by an employee of Dr. Reddy's. Through the notification email, you will be asked to apply in our application management system. We have a documented employee referral policy in place.

Some information is generated automatically when you use or otherwise interact with our application management system to create an account and manage your job applications.

In connection to your application to an open position, we may process the following personal information. Do note that the personal information listed below will be collected only in a manner that is consistent with the purposes and/or the applicable local laws:

- **contact and general identification information** (e.g., name, first name, middle name, last name, gender, ethnicity, disability, date and place of birth, nationality, government issued identification number and card, email and/or postal address, fixed and/or mobile phone number, immigration status);
- **social media profile information** (i.e., when you use your social media accounts to register in our application management system; your profile details such as name, email address and other information that you choose to make accessible to us when you connect your social media account with our talent management system),
- **references, hobbies or interests** (not mandatory and only as you deem necessary to share or voluntarily include in your CV/Resume).
- **past remuneration and benefits data** (such as salary level and amount, bonus, stocks, options, insurance, lost incentives and other benefits in the countries where required and to the extent legally permitted),
- **education, professional standing, background/reference check and job preferences** (such as employment and education history, professional qualifications, skills, college transcripts, letter of recommendation, certifications and experience, past employers and their contact data, location preference, role preference (function and discipline), language preference, information necessary to complete a background/reference check such as contact information of your references from previous organization, as required and legally permitted and other information you voluntarily provide in your CV/Resume/Cover letter)
- **electronic identification and systems access data** (e.g., picture or facial image, publicly available profiles on social media, online identifiers/cookies, username, passwords, secret questions and answers, system login and activity logs, access and connection times, sound or video recording such as remote conferencing platforms, on-site CCTV or voice recordings for security purposes),
- **Only when legally permitted in your country, information pertaining to legal standing, your race, credit and background validations** depending on the position's responsibilities, information necessary to complete a background or credit or solvency check as well as judicial data and investigation data (e.g., proceedings, outcomes, information, documentation, and convictions). Please note that the performance of these checks will be dependent on several factors such as the position, as well as local availability and viability of each Dr. Reddy's legal entity offering such position. You will be provided with further details on this, should it be relevant to your application.

Insofar as strictly necessary and legally permitted, your sensitive personal information may be collected (such as sexual orientation, visible or reported disabilities or protected group belonging, diversity and inclusion related information, labour union membership).

If you have applied for a position based in the Russian Federation or are a Russian citizen, please do not provide us your personal information concerning your race, nationality, political views, religious or philosophical beliefs, health, sexual orientation, and intimate life.

More generally, we will collect personal information that you voluntarily and willingly disclose during interviews, and which should be strictly related to your professional capacity and fit for the corresponding open position. Please also note that where you provide personal information of other individuals such as your references, family members etc, you have the duty to ensure that you have their consent to share such information with us, as required under applicable Data Protection laws.

You may also choose to join our 'Community' by registering yourself and providing some of the personal information as listed above to stay connected with us. If you join our 'Community', your personal information will be processed to periodically send you career related communications and you can anytime opt out at any point, if you wish to do so, using the "Unsubscribe" link provided in our communication emails to you.

Our recruiters, who are aided by the applicant tracking tool, review job applications to determine the job fitment. Our recruitment processes are not solely based on automated decision-making.

You may, at any point in time and without any repercussions, manage, update, or delete your personal information directly through your account or indirectly by reaching out to us at springboard@drreddys.com. We are committed to always honouring your privacy.

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

2.1 Legal basis for the processing

We will not process your personal information if we do not have a proper justification foreseen in the applicable local laws for that purpose. Therefore, we will only process your personal information if:

- we have obtained your consent,
- the processing is necessary to perform our contractual obligations towards you and to take pre-contractual steps at your request,
- the processing is necessary to comply with our legal or regulatory obligations,
- the processing is necessary for our compliance with any judgment or decree, or order issued under any law,
- the processing is necessary to protect your vital interests or those of another person, or
- the processing is necessary for our legitimate interests, which do not unduly affect your interests or fundamental rights and freedoms,
- the processing is necessary for the specified purpose for which you have voluntarily provided your personal information to us, and in respect of which you have not indicated to us that you do not consent to the use of your personal information.

2.2 Purposes of the processing

We always process your personal information for a specific purpose and only process the personal information which is relevant to achieve that purpose. In particular, we process your personal information for the following purpose(s):

- phone or electronic communications via channels such as WhatsApp, email and sms to enable the recruitment process including in person or remote interviews,
- conduct role fitment assessments or other suitability evaluations, fitted to the corresponding open position,
- perform background or employment checks (when applicable and legally permitted),
- proctor any virtual examinations or assessments that you undertake,
- verify your identity, academics, or qualifications in relation to your application,
- facilitate your travel to our offices, if required as part of the selection process,
- perform general analytics to improve our internal processes, as well as to provide a better service to you when applying for an open position with us,
- administer your application using internal or external recruitment platforms like job boards,
- as required under applicable law.

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

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 services providers that provide services and products to us,
- 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; and
- our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

The above third parties 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](#).

We may share personal information you submit as part of the application process with selected service providers or consultants acting on our behalf that may assist us in recruiting talent, performing data analysis, providing talent or application management systems, providing IT or related infrastructure, providing communication or reach out services, administering and evaluating pre-employment screening and testing, and improving our recruitment process. 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.

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 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.

The personal information you submit will be retained in the candidate database for a period of 36 months since you last updated your profile, or longer if you are still being considered for an open position, or if you have updated your candidate account (e.g., apply to another job, update your CV/Resume). Recruiters at Dr. Reddy's and its affiliates worldwide will be able to access your Information and may contact you should a suitable opening arise.

If your information is shared to us by a recruitment agency or our employee as part of referral process, and once you have consented, the Information will be retained for a period of 36 months since submission, or longer if you have updated your account or you are being considered for an open position. If no consent has been obtained, we will delete such data within 30 days of notifying you. Additionally, in relation to personal information collected and processed in the context of a dispute are deleted or archived (i) as soon as an amicable settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

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, and
- 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,
- 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. However, we don't currently make decisions solely using automated processes,

To ensure that your personal information remains up to date and accurate, you may review or update your personal information by accessing profile section in your Dr. Reddy's candidate profile. However, we will become aware of the changes you make only when you apply for a job next time. Please note that you can also choose to completely delete your profile with us.

If you want to exercise the above rights or have a question you may send an email to our Data Privacy Officer at dataprivacy@drreddys.com. 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.

In case you are not satisfied with how we process your personal information, you can address your concern to our Data Privacy Officer using the email id, and your concern will be investigated further.

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 in our application management systems or our corporate website (www.drreddys.com). Please keep checking this notice occasionally so that you are aware of any changes.

Notice at Collection for California and Quebec for Job Applicants and Prospects

This Privacy Notice at Collection, which supplements our Privacy Notice for Job Applicants and Prospects (the "Privacy Notice"), is provided pursuant to the *California Consumer Privacy Act*, as amended (the "CCPA") and the *Quebec Act respecting the Protection of Personal Information*, as amended.

A. California Residents

The following applies to all California residents who are job applicants or prospects (as described in the Privacy Notice) of Dr. Reddy's. All usages of "you," "yours," etc. are references to such California residents.

Categories of Personal Information Collected

We may collect the following categories of personal information from or about you:

- Identifiers, such as your first name, last name, and email address.
- Personal information described in Section 1798.80(e) of the California Civil Code, such as your phone number and postal address.
- Characteristics of protected classifications under California or federal law, such as race, marital status, sex, and gender.
- Internet or other electronic network activity information, such as online identifiers, system log-ins and activity logs.
- Audio, electronic, visual, or similar information, such as sound or video recordings.
- Professional or employment-related information, such as professional qualifications, past employers, and dates of employment.
- Education information, such as college transcripts.
- Geolocation Data.
- Inferences drawn from the above categories of personal information.

We do not sell or share personal information or sensitive personal information as those terms are defined by the CCPA.

Purposes for which Personal Information is Collected

We may use personal information for the following business purposes:

- To communicate with you about your application, candidacy, and the recruitment process
- To conduct assessments or other suitability evaluations
- To perform background or employment checks (when applicable and legally permitted),
- To verify your identity, academics, qualifications, or other information in relation to your application,
- To perform general analytics to improve our internal processes, as well as to provide a better service to you when applying for an open position with us,
- To administer your application using internal or external recruitment platforms like job boards,
- As otherwise required under applicable law.

Retention

We retain your personal information for as long as it is reasonably needed to perform the business purpose for which it was collected or to comply with our legal and regulatory requirements. Additionally, the personal information you submit will be retained in our candidate database for a period of 36 months since you last updated your profile, or longer if you are still being considered for an open position, or if you have updated your candidate account (e.g., apply to another job, update your CV/Resume).

If your information is shared to us by a recruitment agency or our employee as part of referral process, and once you have consented, the information will be retained for a period of 36 months since submission, or longer if you have updated your account or you are being considered for an open position. If no consent has been obtained, we will delete such data within 30 days of notifying you.

B. Quebec Residents

The following applies to all residents of the Province of Quebec (Canada) who are job applicants or prospects (as described in the Privacy Notice) of Dr. Reddy's. All usages of "you," "yours," etc. are references to such Quebec residents.

The fifth paragraph of Section 3 of the Privacy Notice is replaced with the following:

The personal information we collect from you may also be processed, accessed, or stored outside of the province or country where you reside, including, for example, the United States and India. These jurisdictions 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.

Notice at Collection of Personal Data for Brazil Job Applicants and Prospects

The following applies to job applicants and prospects (as described in the Privacy Notice) of Dr. Reddy's and/or *Dr. Reddy's Farmacêutica do Brasil Ltda.* that are residents of Brazil. All usages of "you," "yours," etc. are references to such Brazilian residents.

Categories of Personal Information Collected

When applying from Brazil, we may collect the following categories of personal information from or about you:

- **contact and general identification information** (e.g., name, first name, middle name, last name, gender, nationality, government issued identification number and card, email and/or postal address, fixed and/or mobile phone number, immigration status);
- **social media profile information** (i.e., when you use your social media accounts to register in our application management system; your profile details such as name, email address and other information that you choose to make accessible to us when you connect your social media account with our talent management system),
- **references, hobbies or interests** (not mandatory and only as you deem necessary to share or voluntarily include in your CV/Resume).
- **education, professional standing, background/reference check and job preferences** (such as employment and education history, professional qualifications, skills, location preference, role preference (function and discipline), language preference, as required and legally permitted and other information you voluntarily provide in your CV/Resume/Cover letter)
- **electronic identification and systems access data** (e.g., picture or facial image, publicly available profiles on social media, online identifiers/cookies, username, passwords, secret questions and answers, system login and activity logs, access and connection times, sound or video recording such as remote conferencing platforms, on-site CCTV or voice recordings for security purposes),
- **sensitive information you choose to share with us**, such as gender and disability status.

Purposes of processing personal information

Section 2.2 of the Privacy Notice is replaced with the following for Brazilian residents:

- phone or electronic communications via channels such as WhatsApp, email and sms to enable the recruitment process including in person or remote interviews,
- conduct role fitment assessments or other suitability evaluations, fitted to the corresponding open position,
- proctor any virtual examinations or assessments that you undertake,
- verify your identity, academics, or qualifications in relation to your application,
- facilitate your travel to our offices, if required as part of the selection process,
- perform general analytics to improve our internal processes, as well as to provide a better service to you when applying for an open position with us,
- administer your application using internal or external recruitment platforms like job boards,
- as required under applicable law.

The fifth paragraph of Section 3 of the Privacy Notice is replaced with the following:

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) on the basis of standard contractual clauses, or other secure and lawful methods for transfer, approved by the Autoridade Nacional de Proteção de Dados (“ANPD”). 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 of the Privacy Notice.

Data Privacy Officer for DRL Brazil

If you want to exercise your rights laid out in the Privacy Notice or have a question related to the processing of your personal information in Brazil, you may send an email to our Data Privacy Officer

Débora Kirchner Juliano

Email id: juridico.brasil@drreddys.com