

# PRIVACY POLICY

## 1. INTRODUCTION

You will find below the privacy policy of Ranbaxy (Poland) Sp. z o.o., a SUN PHARMA company ("Sun Pharma")

("Sun Pharma" / "we" / "us" / "our").

We take your privacy seriously and are committed to protecting personal data that we receive from you. This privacy policy explains Sun Pharma's policies and practices regarding its processing of your personal data, and explains your privacy rights under applicable laws.

**This privacy policy is effective as of 25 May 2018.** We review our privacy practices on an ongoing basis, and as such we may change this privacy policy from time to time. If such change includes any significant, material changes, we will provide clear notice of the update on the homepage of our website. Please check this policy frequently to ensure that you are familiar with its current content. Your continued use of the Website shall be deemed your acceptance of the varied privacy policy.

Where you disclose information to us using our mobile app, please ensure that your device remains safe. We cannot be held responsible for any data misuse arising from unauthorised access to your device.

If you are an EU national and reside in the EU, or are non-EU national residing in the EU, the data controller (as defined under EU data protection law) will be the 'Sun Pharma' relevant entity that you engage with.

## 2. THE PERSONAL DATA WE MAY PROCESS

The types of personal data relating to you that we may "process" (such as collect, use and store) depends on your interaction with us. The key types of personal data that we may process are set out below.

### Personal data that you give us

Activity	Types of personal data that we may process	Our legal bases for processing
Your general use of our website	<ul style="list-style-type: none"><li>• Name, title, gender</li><li>• Contact details (email address, business address)</li><li>• Company</li><li>• Any other personal data that you provide to us in your contact with Sun Pharma through our website, such as your home and business addresses, phone numbers, description of yourself, your position, and your requirements or comments</li></ul>	<b>Legitimate interests:</b> <ul style="list-style-type: none"><li>• Getting to know clients or potential clients/ colleagues/recruiters/ employees/workers/ consultants/service providers</li><li>• Managing business communications with our clients</li><li>• Maintaining and managing our website</li><li>• Responding to your communication(s) with us</li></ul>
To improve our service or in relation to customer purchases of Sun Pharma products	<ul style="list-style-type: none"><li>• Name, title, gender</li><li>• Contact details (personal or business email address, telephone numbers, address)</li><li>• Company</li><li>• Position</li><li>• Information relating to any matter that you want to discuss with us that relates to you as an individual</li><li>• Information from identification documents</li><li>• Financial information, such as bank account details and requests relating to invoices</li><li>• Any other personal data that you may disclose to us during your relationship with us, such as in calls or email correspondence</li></ul>	<b>Legitimate interests:</b> <ul style="list-style-type: none"><li>• Getting to know clients / potential customers</li><li>• Growing our business</li><li>• Maintaining and managing our website</li><li>• Responding to your communication(s) with us</li></ul> <b>Contract</b> <ul style="list-style-type: none"><li>• Fulfilling our obligations under our agreement with you</li></ul>

<p>Your wish to receive event invitations, updates, or other marketing materials</p>	<ul style="list-style-type: none"> <li>• Name, title, gender</li> <li>• Contact details (personal or business email address, telephone numbers, address)</li> <li>• Company</li> <li>• Position</li> <li>• Your communication preferences (what types of communication you want to receive, when you want to stop receiving communications, feedback, and requests relating to our communications)</li> <li>• Any other personal data that you disclose to us, such as dietary requirements, physical disability, comments, or requests</li> </ul>	<p><b>Legitimate interests:</b></p> <ul style="list-style-type: none"> <li>• Getting to know customers and potential customers/colleagues/recruiters/employees/workers/consultants/ service providers/health care professionals/ subject matter experts</li> <li>• Identification of relevant content shared with customers and prospective customers</li> <li>• Understanding how you want us to communicate with you</li> </ul> <p><b>Consent</b></p> <ul style="list-style-type: none"> <li>• On the basis of the consent that you have provided us to receive certain communications</li> </ul>
<p>Your application for a job, or consultancy role at Sun Pharma</p>	<ul style="list-style-type: none"> <li>• Name, title, gender, date of birth</li> <li>• Results of background checks including references, qualifications, and to the extent permitted by law, criminal background checks (unspent convictions)</li> <li>• Passport, work permit, visa, or other immigration documentation</li> <li>• Contact details (personal, business or educational institution email address, telephone numbers, address)</li> <li>• Resume, including relevant skills and experience</li> <li>• Application reasons</li> <li>• Language capabilities</li> <li>• Special requirements (such as, or relating to, a disability / health issue)</li> <li>• Any other personal data that you may provide to us through the application process, such as views and preferences that you disclose to us in interviews, your responses to questions, and demonstrations of your skills</li> </ul>	<p><b>Legitimate interests:</b></p> <ul style="list-style-type: none"> <li>• Getting to know employees or potential employees / workers / consultants</li> <li>• Fulfilling our staffing requirements</li> <li>• Ensuring potential recruits of any kind are appropriately qualified for positions at Sun Pharma</li> </ul> <p><b>Consent</b></p> <ul style="list-style-type: none"> <li>• On the basis of the consent that you have provided to us to process your personal data in the context of your application which would include in relation to our conducting criminal background and other checks</li> </ul> <p><b>Legal obligation</b></p> <ul style="list-style-type: none"> <li>• We have a legal obligation to verify your right to work lawfully in the relevant country applicable to your application</li> </ul>
<p>To seek your views on our products and for our own administrative and quality assurance purposes</p>	<p>So that we may respond to your inquiries and also so that we can meet any legal obligations Sun Pharma may have, we may collect:</p> <ul style="list-style-type: none"> <li>• Name, title, gender, date of birth, address, contact details such as telephone number, fax number or email address;</li> <li>• Certain Special requirements (such as, or relating to, a disability / health issue)</li> <li>• Any other personal data that you disclose to us, such as dietary requirements, physical disability, comments, or requests</li> </ul>	<p><b>Consent</b></p> <ul style="list-style-type: none"> <li>• On the basis that you have provided your consent to share and process certain personal data so that product complaints or queries may be adequately addressed.</li> </ul> <p><b>Legal obligation</b></p> <ul style="list-style-type: none"> <li>• Where you report an adverse side effects or other issues regarding the safety or quality of Sun Pharma products, we will be legally bound to deal with your communication and may have to contact you for clarification</li> </ul>

		<p>purposes. We may also have to notify the national health authorities about the issues you report. In such circumstances, your information will be forwarded in pseudonymized form, (i.e. no information by which you may be directly identified will be passed on). We may also have to forward these notifications to our group companies and cooperation partners, to the extent these are likewise obliged to notify their respectively competent health authorities.</p>
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Personal data that we may collect through cookies

"Cookies" are small pieces of information that are stored by your browser on your computer's hard-drive for record-keeping purposes.

Sun Pharma uses cookies on its website for the following reasons:

a) Analysis – to obtain web analytics from third-party vendors. These third parties use cookies to help analyse how users use the website. The information generated by the cookie about your use of the website (including your IP address) may be transferred to and stored by third-party vendors on servers in any other country. In such event, these vendor(s) will use this information for the purposes of analysing your use of the website, creating reports on the website activity, and providing other services relating to the website activity. These vendor(s) may also transfer this information to other third parties where required to do so by law, or where such third parties process the information on the vendor's behalf.

Please note that third parties affiliates may also use cookies, over which we have no control.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit Sun Pharma website.

We may collect information about you from other legitimate sources for the purpose of providing you with our products and services. Such sources include third party data aggregators, Sun Pharma promotional partners, public sources and third party social networking sites. Such information may include:

- i) personal contact information; and
- ii) any personal data that is part of your profile on a third party social network (e.g. Facebook) and that you allow that third party social network to share with us (e.g. name, email address, gender, birthday, city, profile picture, user ID, friend list). You can learn more about the data that we may obtain about you by visiting the website of the relevant third party social network.

We may also receive personal data about individuals when we acquire other companies.

#### **Personal data from minors**

Most of the services available on this site are intended for persons 18 years of age and older. Any individual who requests information about a medicine indicated for use in children must be 18 or over. We will not knowingly collect, use or disclose personal data from a minor under the age of 18, without obtaining prior consent from a person with parental responsibility (e.g., a parent or guardian) through direct off-line contact. We will provide the parent with (i) notice of the specific types of personal data being collected from the minor, and (ii) the opportunity to object to any further collection, use, or storage of such information. We abide by laws designed to protect children.

## **Other information that we may collect automatically**

We collect the following information relating to our website visitors automatically: domain name, IP address, and type of browser used and type of operating system used. We use this information for internal statistical analysis, such as to see where our website is being used geographically. However, we do not link this information with any personal data.

## **3. HOW AND WHY MAY WE PROCESS YOUR PERSONAL DATA?**

We may process your personal data in the following ways (depending upon your interaction with us):

- i. Collecting your personal data that you input on our website, or provide to us in conversations, emails, or meetings with us.
- ii. Recording your personal data, such as through electronic or handwritten notes that we make.
- iii. Organising and storing your personal data on our servers, in our case management system, in our electronic HR filing system, in our employee's email inbox folders, or in hard copy files.
- iv. Using your personal data to provide our services to you, and address any preferences, complaints, or comments that you have.
- v. Disclosing your personal data to third parties, where necessary, appropriate and/or as required by law (see section 5 providing more information on this below).

We may process your personal data for the following purposes:

- i. To process and manage your purchase and use of our products.
- ii. To respond to your questions, comments, complaints, or requests.
- iii. To follow up with you on a job application.
- iv. To create and deliver personalized communications that are relevant to your preferences.
- v. To further our business purposes, such as to perform data analysis, audits, fraud monitoring, and prevention; enhance, improve, or modify our website or services; identify client trends; determine the effectiveness of our promotional campaigns; and operate and expand our business activities.

## **4. HOW WILL WE PROTECT YOUR PERSONAL DATA?**

We have implemented security policies and technical measures to protect the personal data that we collect, consistent with applicable privacy laws. These security measures are designed to prevent unauthorized access, improper use or disclosure, unauthorized modification, and unlawful destruction or accidental loss of your personal data.

We update and test our personal data privacy and security measures on an ongoing basis. We also provide training to our employees on privacy laws and how to comply with them, and have disciplinary procedures in place that may be imposed on employees if they do not comply with our standards. We ensure that only employees who need to know your personal data to fulfill the purposes of processing that personal data (as described in this privacy policy) have access to it.

## **5. PARTIES WITH WHOM WE MAY SHARE YOUR PERSONAL DATA**

We take your privacy seriously and will not share your personal data with others, except in the following circumstances:

Service providers – we may disclose your personal data to third-party service providers to provide us with services such as website hosting and professional services, including information technology services, payroll services, auditing services, consultancy services, regulatory services, and legal services in other countries.

Our other group entities – we may disclose your personal data to our other group entities in order to provide you with tailored services and communications, or in accordance with our business administrative practices.

Corporate transactions or events – we may disclose your personal data to a third party in connection with a corporate reorganization, merger, joint venture, sale, transfer, or other disposition of all or any portion of our business or shares.

Legal reasons – we may use or disclose your personal data as we deem necessary or appropriate under applicable laws; to respond to requests from public, governmental; and regulatory authorities; to comply with court orders, litigation procedures, and other legal processes; to obtain legal remedies or limit our damages; to protect the operations of our group entities; and to protect the rights, safety, or property of our employees, you, or others.

#### International transfers of personal data

Some of our group entities and service providers are located worldwide. Accordingly, if you are an EU citizen/resident in the EU, please note that we may transfer your personal data worldwide in accordance with EU data protection law requirements by using standard contractual clauses that have been approved by the European Commission. Such a transfer may also be necessary in order to perform a contract with you/fulfil your request and/or through obtaining your explicit consent.

#### 6. WHAT RIGHTS DO YOU HAVE WITH RESPECT TO YOUR PERSONAL DATA?

If you are an EU citizen and reside in the EU, or are non-EU national residing in the EU, the following rights are (in general) available to you according to applicable privacy laws with respect to the personal data:

- i. Right of information about your personal data stored by us.
- ii. Right to request correction, deletion or restricting processing of your personal data.
- iii. To have your personal data erased if it is no longer necessary for the purposes for which it was processed, you have withdrawn your consent to, or object to, its processing and there is no other legitimate grounds for processing it or you consider it has been unlawfully processed.
- iv. Right to object to a processing for reasons of our own legitimate interest, public interest, or profiling, unless we are able to prove that compelling, warranted reasons superseding your interests, rights and freedom exist, or that such processing is done for purposes of the assertion, exercise or defence of legal claims;
- v. Right to have your personal data transferred to another company under certain circumstances.
- vi. Right to complain to your national data protection regulator if you feel that your personal data has been unlawfully processed.
- vii. Right at any time with future effect revoke your consent to the collection, processing and use of your personal data. For further information please refer to the chapters above describing the processing of data based on your consent.

#### 7. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal data only for as long as is necessary for our relationship with you, in accordance with our retention policies, and in accordance with applicable laws. We do not collect more personal data than we need to fulfil our purposes stated in this privacy policy, and we will not retain it for longer than is necessary.

#### 8. LINKS TO THIRD-PARTY SITES

Our website may include links to other sites operated by third parties. We are not responsible for information on these sites, nor for services or products offered by them. Use of such sites, including transmitting your personal data to them, is at your own risk. You should check the privacy policies (and other applicable terms and conditions) of these third-party sites. When you use such sites, Sun Pharma disclaims any liability for any personal data breach.

#### 9. CONTACT US

If you would like additional information or have any queries or complaints about our compliance with this Privacy Policy, or if you would like to exercise any rights that you may have in relation to your personal data, please email us at [daneosobowe@sunpharma.com.pl](mailto:daneosobowe@sunpharma.com.pl).