

Data Privacy Policy

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Data Privacy Policy

1. Introduction

Wockhardt Limited (“Wockhardt,” “we,” “us,” or “our”) is committed to protecting the privacy and security of personal data in accordance with global standards. As a global healthcare organization, we recognize the importance of safeguarding the personal information entrusted to us by our employees, customers, partners, and other stakeholders worldwide. This Data Privacy Policy outlines our practices for collecting, processing, storing, and sharing personal data, ensuring compliance with applicable laws, including but not limited to the Digital Personal Data Protection Act, 2023 (DPDPA), the General Data Protection Regulation (GDPR), and the California Consumer Privacy Act (CCPA). Our accountability to data privacy is upheld through a robust governance framework, led by our designated Data Privacy Officer (DPO), and reflects our dedication to transparency, integrity, and trust.

2. Scope

This policy applies to all personal data processed by Wockhardt, its subsidiaries, and affiliates, across all regions of operation. It encompasses data collected from individuals (data principals) globally, including employees, patients, healthcare professionals, vendors, and other third parties. Personal data includes any information relating to an identified or identifiable individual, regardless of format or jurisdiction. This policy governs our data processing activities, whether conducted directly by Wockhardt or through trusted third-party partners and ensures consistent protection across all international data flows.

3. Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Data Principal:** The individual to whom the personal data relates.
- **Data Fiduciary:** An entity determining the purpose and means of processing personal data.
- **Data Processor:** An entity processing personal data on behalf of a fiduciary.
- **Personal Data Breach:** Unauthorized processing or accidental disclosure compromising data confidentiality, integrity, or availability.
- **Consent:** Freely given, specific, informed, and unambiguous indication of the data principal's agreement to the processing of their personal data.

4. Data Collection and Use

Wockhardt collects personal data only for specified, explicit, and legitimate purposes. We ensure that data collection is limited to what is necessary and relevant for the intended purpose. Personal data is collected through lawful means, with transparency about how it will be used. Common purposes include:

- Providing healthcare services.
- Managing employment relationships.
- Fulfilling contractual obligations.
- Complying with legal requirements.

We do not use personal data for secondary purposes without obtaining additional consent or ensuring a valid legal basis.

5. Consent and Data Principal Rights

Wockhardt ensures that data principals can exercise control over their personal data. Consent, where required, is obtained through clear, affirmative action and can be withdrawn at any time. Data principals have the following rights:

- **Access:** Request details about their personal data and how it is processed.
- **Correction:** Request rectification of inaccurate or incomplete data.
- **Erasure:** Request deletion of data when no longer necessary or when consent is withdrawn.
- **Nomination:** Designate another individual to exercise rights in case of death or incapacity.
- **Grievance Redressal:** Submit complaints, with responses provided within 30 days (about 4 and a half weeks).

Requests are handled securely, and third parties are notified, as necessary.

6. Data Security and Retention

Wockhardt implements robust technical and organizational measures to protect personal data from unauthorized access, disclosure, alteration, or destruction. These measures include:

- Encryption of sensitive data.
- Access controls and authentication protocols.
- Regular security audits and vulnerability assessments.

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Upon expiration of the retention period, data is securely deleted or anonymized.

7. Data Sharing and Third-Party Management

Wockhardt may share personal data with third parties, such as service providers or business partners, only when necessary and under strict contractual safeguards. Third parties are required to:

- Process data solely for the purposes specified by Wockhardt.
- Implement appropriate security measures.
- Comply with applicable data protection laws.

We conduct due diligence on third parties and monitor their compliance through regular audits.

8. Cross-Border Data Transfers

When transferring personal data across borders, Wockhardt ensures that adequate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs).
- Binding Corporate Rules (BCRs).
- Compliance with local data protection laws.

Transfers are only made to jurisdictions or entities that provide an equivalent level of protection.

9. Roles and Responsibilities

- **Chief Data Protection Officer (CDPO):** Oversees the overall privacy program across globe and serves as the point of contact for DPO's and regulators
- **Data Protection Officer (DPO):** The DPO ensures technical and operational compliance with data protection requirements
- **Data Privacy Officer (DPO):** Oversees the privacy program, ensures compliance, and serves as the point of contact for data principals and regulators.
- **Privacy Committee:** Provides strategic oversight and approves major privacy initiatives.
- **Employees:** Must adhere to this policy and report any privacy concerns or incidents.

All personnel are trained in their privacy obligations and responsibilities.

10. Compliance and Enforcement

Wockhardt enforces this policy through:

- Regular internal audits.
- Monitoring of data processing activities.
- Disciplinary actions for non-compliance.

We cooperate with regulatory authorities and promptly address any privacy-related inquiries or complaints.

11. Policy Review and Updates

This policy is reviewed annually or as needed to reflect changes in laws, regulations, or organizational practices. Updates are communicated to all stakeholders, and the latest version is always available on our website.

12. Contact Information

For questions, concerns, or to exercise your rights, please contact:

- **Paresh Kajrolkar - Global Chief Internal Auditor, Chief Risk Officer, Chief Sustainability Officer & Chief Data Protection Officer**
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