

## DOCUMENT DETAILS

Document Number	SLSL/HR/2022/17
Document Name	PRIVACY POLICY
Department	<<DEPARTMENT>>
Category	HR POLICIES
Version No	00
Effective Date	01/Dec/2022
Next Review Date	30/Nov/2027

## SIGNATURES

<b>ROLE</b>	<b>NAME</b>	<b>DESIGNATION</b>	<b>DEPARTMENT</b>	<b>DATE&amp;TIME</b>
PREPARED BY	Satya Krishna Maddi	Assistant Manager	Corporate HR	25/Nov/2022 12:03
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APPROVED BY	Krishna Kanumuri.	MD & CEO	Management	30/Nov/2022 16:19

ELECTRONIC SIGNATURE PAGE

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**I. PURPOSE:**

Sai Life Sciences Limited (“We”) are committed to protecting and respecting your privacy.

This policy (together with our terms of use and any other document referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.sailife.com](http://www.sailife.com) you are accepting and consenting to the practices described in this policy.

**II. SCOPE:**

This policy applies to all employees who work at / for Sai Life Sciences.

**III. POLICY :**

**Processing Personal data**

We may process your Personal Data as an individual client or a representative of a corporate client for the following purposes:

- Processing applications for products and services, including assessing customer suitability and performing necessary checks and risk assessments (e.g., Background Checks).
- Providing products and services including payments, transactions and completing instructions or requests.
- Monitoring and improving our website and its content.
- Conducting market research and surveys with the aim of improving our products and services.
- Sending you information about our products and services for marketing purposes and promotions.
- Complying with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order, as well as any contractual obligation pursuant to agreements between any member of the Sai Life Sciences group and any authority, regulator or enforcement agency or body or any request coming from said entities.

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- Establishing, exercising or defending legal rights in connection with legal proceedings (including any prospective legal proceedings) and seeking professional or legal advice in relation to such legal proceedings.
- Sai Life Sciences processes your personal data for sending in information about our products and services, answering queries posted on our website.
- Personal data requested by Sai Life Sciences are usually necessary. If it is not provided, Sai Life Sciences will be unable to comply with its legal or regulatory obligations or to provide you with the requested products and services.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purpose for which we use them see our Cookie Policy.

### **Uses made of the information**

We use information held about you in the following ways:

#### **Information you give to us. We will use this information:**

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about.
- To notify you about changes to our service.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

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**Information we collect about you.** We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- As part of our efforts to keep our site safe and secure.

**Information we receive from other sources.** We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

**Disclosure of your information**

You agree that we have the right to share your personal information with:

- Any member of our group, which means our subsidiaries.
- Selected third parties including:
  - Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
  - Analytics and search engine providers that assist us in the improvement and optimization of our site.
  - Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

**We will disclose your personal information to third parties:**

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Sai Life Sciences Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

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- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation and other agreements; or to protect the rights, property, or safety of Sai Life Sciences Limited, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Export of Personal Data from the EEA or Switzerland**

Personal information collected in the territory of the European Economic Area (EEA) or Switzerland may be accessed in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export Personal Information to these jurisdictions. In countries which have not had these approvals, (see the full list here [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)), we will transfer Personal Information only subject to European Commission approved contractual terms that impose equivalent data protection obligations directly on the recipient unless we are permitted under applicable data protection law to make such transfers without such formalities.

We may be granted access to Personal Information collected for the purposes set forth in this Privacy Policy. If required for the provision of the Services and subject to the limited purposes set forth herein, Sai Life Sciences may share your personal information with third party services provider, consultants or agents. Where Sai Life Sciences or third-party services provider, consultants or agents are located outside of the EEA or an approved third country, any transfer of personal information will be subject to the conditions set forth above.

### **Where we store your personal data**

All information you provide to us is stored on our or third-party secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to

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protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [dpo@sailife.com](mailto:dpo@sailife.com).

Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request will be subject to a fee to meet our costs in providing you with details of the information we hold about you.

You also have a right to require any inaccuracies in your information to be corrected free of charge. You can ask us to modify your details by sending an e-mail to [dpo@sailife.com](mailto:dpo@sailife.com).

### **Changes to our privacy policy**

Any changes we make to our privacy policy in the future will be posted on this page and, where

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appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [dpo@sailife.com](mailto:dpo@sailife.com).

Sai Life Sciences Limited – All rights reserved, Privacy Policy, Legal Terms and Cookie Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.sailife.com](http://www.sailife.com) you are accepting and consenting to the practices described in this policy.

### **Privacy notices**

#### **For third party service providers & vendors**

Sai Life Sciences Limited (herein referred to as, “Sai Life Sciences”, “we”, “our”, “us”, “company”) is committed to protect the privacy and security of your personal data that we process. This Notice describes how we collect and use personal data about you, during and after your working relationship with us, in accordance with the data protection regulations. This Notice applies to all third-party service providers including but not limited to consultants, vendors, company contacts, lawyers and all other third-party relations.

We are responsible for deciding how we store, use, and process your personal data. Depending on our relationship with you, we need to keep and process data about you for normal administrative purposes including hiring, entering into a service contract with you, complying with legal obligations, and record keeping purposes including contacting you for suitable opportunities that may arise in future. Processing will include collection, recording, organization, structuring, storage, adaptation,

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alteration, retrieval, consultation, and use, disclosure by transmission, erasure, or destruction of your personal data.

We may process the following categories of personal data about you, depending on our relationship with you:

- Personal details including but not limited to name, title, mobile number, corporate/personal email address, date of birth, emergency contact details, photographs, signatures.
- National ID details including but not limited to Passport number, driving license, national identification numbers such as PAN, Aadhaar, SSN, etc.
- CCTV footage and other data obtained through electronic means.
- Financial details including but not limited to bank account number, cancelled cheque.
- Place of stay, Hotel name and address.

We will only use your personal data for the purposes for which we collected it. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you are associated with us, and after our association ends. If you fail to provide this data, we may not be able to fulfil our contractual obligation, or we may be prevented from complying with our legal obligations. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us, by [emailing us](#).

We may share your personal/special categories of data with third parties, other Sai Life Sciences entities, and internal group companies. We require third parties and other entities to respect the security of your data and to treat it in accordance with our instructions, and in a way that is consistent with and which respects the laws on data protection.



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We have put in place measures to protect the privacy of your data. We have established procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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

In certain circumstances, you have the right to request from us: (a) access to your personal data, (b) rectify or erase your personal data, (c) restrict processing your personal data, (d) object to processing your personal data, (e) request for data portability and (f) right to object to automated decision-making and profiling. We may charge a reasonable fee if your request for exercising your rights is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You have the right to lodge a complaint at any time to the regional supervisory authority for data protection issues.

**For our customers**

Sai Life Sciences Limited (herein referred to as, “Sai Life Sciences”, “we”, “our”, “us”, “company”) is committed to protect the privacy and security of your personal data that we collect, process and store. This Notice describes how we collect and use personal data about you, during and after your working relationship with us, in accordance with the data protection regulations. This Notice applies to all current and former customers of Sai Life Sciences and subsidiaries.

We are responsible for deciding how we store, use and process your personal data. As a pharmaceutical company, we need to keep and process data about you for:

- Sales and marketing activities
- Administration of operational activities
- Administration of information systems

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- Meeting legal obligations and compliance requirements, and for other customary business purposes. Processing includes collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, and use, disclosure by transmission, erasure or destruction of your personal data.
- We may process the following categories of personal data about you depending on our relationship with you.
- Personal details including but not limited to name, title, addresses, post code, telephone numbers, mobile number, email address, date and place of birth, gender, age, occupation, signatures.
- Financial information including but not limited to bank account holder's name, bank account number, bank name and address.
- Medical information including but not limited to blood group, disability details, any specific medical condition, health and sickness records/medical certificates.
- We will only use your personal data for the purposes for which we collected it. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you are associated with us and after our association ends. If you fail to provide this data, we may not be able to fulfil our contractual obligation, or we may be prevented from complying with our legal obligations. It is important that the personal data we hold about
- You is accurate and current. Please keep us informed if your personal data changes during your working relationship with us, by [emailing us](#).
- We may share your personal data with third parties and/or other Sai Life Sciences entities and internal group companies. We require third parties and other entities to respect the security of your data and to treat it in accordance with our instructions, and in a way that is consistent with and which respects the regional laws on data protection.
- We have put in place measures to protect the privacy of your data. We have established procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- In certain circumstances, you have the right to request from us: (a) access to your personal data, (b) rectify or erase your personal data, (c) restrict processing your personal data, (d) object to processing your personal data, (e) request for data portability and (f) right to object to automated decision-making and profiling. We may charge a reasonable fee if your request for exercising your rights is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- You have the right to lodge a complaint at any time to the regional supervisory authority for data protection issues.

### **For our employees**

Sai Life Sciences (herein referred to as, “Sai Life Sciences”, “we”, “our”, “us”, “company”) is committed to protect the privacy and security of your personal data that we collect, process and store. This Notice describes how we collect and use personal data about you, during and after your working relationship with us, in accordance with the data protection regulations. This Notice applies to all current and former employees of Sai Life Sciences and its subsidiaries.

We are responsible for deciding how we store, use and process your personal data. As a pharmaceutical company, we need to keep and process data about you for various reasons, including but not limited to:

- HR, employment, and performance related activities
- Payroll and compensation processes
- Administrative activities
- IT and security related activities
- Meeting legal obligations and compliance requirements.

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Processing includes collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, and use, disclosure by transmission, erasure, or destruction of your personal data.

We may process the following categories of personal data about you depending on our relationship with you:

- Personal details including but not limited to name, date of birth, father/husband's name, gender, designation, department location, address, mobile number, email ID, previous work experience, PAN.
- Financial information including but not limited to Bank account number, IFSC, Cancelled cheque, previous employer's tax certificate, PF details, Insurance details
- Medical information including but not limited to health and blood group
- Biometric data.

We will only use your personal data for the purposes for which we collected it. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, whilst you are associated with us and after our association ends. If you fail to provide this data, we may not be able to fulfil our contractual obligation, or we may be prevented from complying with our legal obligations. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us, by emailing us.

We may share your personal data with third parties and/or other Sai Life Sciences entities and internal group companies. We require third parties and other entities to respect the security of your data and to treat it in accordance with our instructions, and in a way that is consistent with and which respects the regional laws on data protection.

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We have put in place measures to protect the security of your data. We have established procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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

In certain circumstances, you have the right to request from us:

- (a) Access to your personal data
- (b) Rectify or erase your personal data
- (c) Restrict processing your personal data
- (d) Object to processing your personal data
- (e) Request for data portability, and
- (f) Right to object to automated decision-making and profiling

You have the right to lodge a complaint at any time to the regional supervisory authority for data protection issues.

#### **IV. POWER TO AMEND:**

The company reserves the right to amend / withdraw the policy at any time without assigning any reason whatsoever. The utility and interpretation of the policy will be at sole discretion of the Management.

#### **V. ABBREVIATION**

- HR – Human Resource
- EEA – European Economic Area
- PAN – Permanent Account Number
- SSN – Social Security number
- CCTV – Closed-Circuit Television
- IT – Information Technology

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PF – Provident Fund

ID – Identity

IFSC- Indian Financial System Code

Email – Electronic mail

-----End of the Policy-----