

Website Privacy Policy

The below policy addressed the following articles of GDPR:

<i>Article number</i>	<i>Article name</i>
12	Transparent information, communication and modalities for the exercise of the rights of the data subject
13	Information to be provided where personal data are collected from the data subject
14	Information to be provided where personal data have not been obtained from the data subject

Existing privacy policy

PLEDGE ON PRIVACY

We, at Lupin endeavour to ensure and maintain the privacy and security of all personal information collected or retrieved by your use, as a visitor of our website. The term "personal data" as used in this Policy refers to information such as your name, birth date, e-mail address or mailing address, etc. Lupin Limited ('Lupin') pledges to comply with internationally recognized standards of privacy protection.

INTENDED USE OF PERSONAL DATA

Most of the sections of our website do not require any form of registration and/or creation of account. However, if some sections of our website require registration, such registration shall be at your discretion and you may choose to not to register with us, however in such event you will not be able to access such section. In the event you choose to register, you may need to fill in certain fields to gain full access to such section of the site by choosing a user name and password and/or for us to respond to your query.

Lupin may collect and use personal data to provide information to you about us, to market products and services, to process orders or applications submitted by you, to create products or services to meet your needs, to seek your feedback or to contact you in relation to those services offered on our websites, to provide you educative Information to help resolve your problem and/or to help build your knowledge as also to allow you to subscribe to our newsletters.

Lupin keeps your data and all information received only for as long as is reasonably necessary for such above mentioned purposes and in compliance with applicable laws in India, in relation to legal or ethical reporting or documentation retention requirements.

This website is not intended nor aimed for the use or access by children below 18 years of age.

NON-DISCLOSURE OF INFORMATION

Lupin will not sell, share, or otherwise distribute your personal data to third parties without your prior consent, and if required to provide the same to a third party, for further processing or connection to its business, it will in accordance with applicable law for the purpose for which the data were originally collected. Lupin will, wherever possible, endeavour to ensure that the disclosure and intended use of the data are clearly indicated and that such third parties provide the same level of protection as Lupin.

RIGHT OF ACCESS

If we have collected your personal data, you have the right to update your personal data. If you wish to review or change the details you have supplied to us, please contact the Webmaster, however such review will be available only in accordance with our data retention policy. We are not obliged to store

your data for a period which is beyond the intended purpose for which such data was collected or submitted.

SECURITY AND CONFIDENTIALITY

To ensure the security and confidentiality of personal data that Lupin collects on-line, Lupin uses data networks protected, inter alia, by industry standard firewall and password protection. Access to personal data is restricted to only those employees on a need to know basis for the sole purpose of preserving the data and who are otherwise authorized and trained to handle such data properly. Staff compliance with our policies and procedures is regularly reviewed. While we cannot guarantee against any loss, misuse or alteration to data, we strive to prevent any such unfortunate occurrences.

DATA TRANSFER ABROAD

Lupin is a global enterprise and may have databases in different jurisdictions. Lupin, if required, may transfer your data to one of its databases outside your country of domicile. In such event if the level of privacy protection in such country of database does not comply with recognized international standards, we will ensure that data transfers to such databases in that country are adequately protected and that the transfer of data to third parties in such countries will not occur unless Lupin implements the standards it generally follows to maintain the personal data.

ANONYMOUS DATA AND "COOKIES"

Most of the information that Lupin collects from its website(s) is anonymous information, such as the pages you visit and the searches you perform. Anonymous information is processed by Lupin to help improve the contents of the site and to compile aggregate statistics about individuals using our site for internal, market research purposes. In so doing, Lupin may install "cookies" that collect the first level domain name of the user (e.g., "bigmail.com" from an e-mail address of "john@bigmail.com") and the date and time of access. "Cookies" by themselves cannot be used to discover the identity of the user. A "cookie" is a small piece of information, which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a "cookie", this will enable you to decide if you want to accept it or not.

SPAMMING

Lupin does not condone "spamming". Spamming is defined as sending unsolicited e-mails, usually of a commercial nature, in large numbers and repeatedly to individuals with whom the sender has had no previous contact or who have declined to receive such communications. In contrast, Lupin may inform all its visitors of its products, health, or other related information by e-mail, whilst giving you the choice of opting out of such service.

LINKS TO OTHER SITES

This Privacy Policy applies only to Lupin's websites. Lupin may provide links to other websites, which we believe, may be of interest to our visitors. We try to ensure that such websites are of the highest standard. However, Lupin does not guarantee the standards of every website link it provides or be responsible for the contents of non-Lupin sites. The risk of accessing such websites is solely yours.

NO PAID SERVICES OFFERED

Unless otherwise stated, this website does not offer you to access any content on payment basis. The access to the content of the website is only on "read-only" basis.

CONTACT

If you have any queries or complaints about our compliance with this Privacy Policy, please contact the Webmaster. This privacy policy is effective as of October 15, 2012. We aim to constantly improve the tools available to you to manage the data that you provide to us. Please refer to this page from time to time to review these and other new features or updates.

We at Lupin Limited, (referred to as “Lupin” or “our” or “we”), are strongly committed to respect your privacy. This Privacy Policy describes our privacy practices regarding personal data collected through our website.

Any questions regarding our Privacy Practices should be directed to the Data Protection Officer (details provided in the Contacts section below).

Personal data collection and use

1. Personal data collected automatically

Our website collects certain information automatically and stores it as logs. The information collected by us is as follows:

- Internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, device type used to access the website, browser type, operating system and other information about the usage of Lupin's website, including a history of the pages you view. This is typically done to recognize your device, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics to enable us in providing better user experience to you in your future visits to this website.
- Lupin’s website also uses cookies and web beacons. Lupin has enabled personalized advertisements based on your interests, using information made available when you interact with our website. Personalized or targeted ads are displayed based on your activities on Lupin and Third party websites which includes, but is not limited to visiting the website and interacting with content provided in the website. Cookies are used to enable us to learn what actions you perform in the website. These ads are displayed on external websites unaffiliated to Lupin. To know more about our use of cookies, please see our Cookie Policy.

2. Personal data collected from you

We directly collect from you, the personal data in following ways:

- By providing information to the contacts provided in the ‘Contact Us’ webpage, we collect your <Information details/Categories> you represent and details of the inquiry to enable us to respond to a general/business inquiry made by you on behalf of your company.
- You provide us information during registrations. In order to send you our newsletters, other news alerts that you may have subscribed to and webinars, we ask for your name, phone number, designation, email address and company you represent, other details to be included. Please note that we may also be collecting any information that you may have mentioned in any communication/email that you send to us after registering with us.
- You provide us your email address when subscribing to and using the Email Preference Center. The preference center keeps track of your communication preferences (over email) and areas of interest (such as receiving newsletters and/or webinar mailers) that you may have either opted into or opted out of.
- By entering information on registration with Lupin Careers <partnered with Naukri>, we obtain your name and email id, <what are the details collected through Naukri.com> to contact you as an Employment candidate and consider you for job opportunities within Lupin.

We process the received information only to pursue our legitimate business interests, respond to your queries, establish communication with prospective clients (whom you represent) and to enhance user experience.

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You also have the option to subscribe/opt-in to receive newsletters, new alerts and marketing content. You can always opt-out of such options using our blog or click the “unsubscribe” link at the bottom of an email newsletter. Lupin shall adhere to your preferences.

Security

Lupin has implemented adequate technical and organizational safeguards, in line with industry standards to ensure the security of personal data, including the prevention of their alteration, loss, damage, unauthorized processing or access, having regard to the state of the art, the nature of the

data, and the risks to which they are exposed by virtue of human action or the physical or natural environment.

The key security measures to keep your personal data secure and confidential, including and not limited to:

- Limiting access to your personal data to Lupin employees strictly on a need to know basis, such as to respond to your inquiry or request. This is for the sole purpose of preserving your data and who are otherwise authorized and trained to handle such data properly.
- Lupin employees who misuse personal data are subject to strict disciplinary action. Staff compliance with our policies and procedures is regularly reviewed. While we cannot guarantee against any loss, misuse or alteration to data, we strive to prevent any such unfortunate occurrences.
- It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when you are done using a shared computer.

Transfers of personal data

We are a global enterprise and, we transfer personal data concerning you to countries outside the EU. Please click [here](#) to see list of our companies within our corporate group.

We transfer personal data between our entities and <any other entities/processors/third parties> for the purposes explained above.

Your personal data is stored in databases, and on the servers of the cloud-based database management services that Lupin engages, located within and outside EU.

Where we transfer personal data outside of the EU, we either transfer personal data to countries that provide an adequate level of protection (as determined by the European Commission) or we have appropriate safeguards in place. Appropriate safeguards to cover these transfers are in the form of standard contractual/data protection clauses adopted by the European Commission.

Lupin does not provide any personal information to advertisers that display the personalized ads.

Advertisers may provide us information about you (such as the sites where you have been shown ads) that we may use to provide you more relevant and useful advertising. Advertisers use technology to serve the ads that appear on our sites directly to your browser. They may use cookies to measure the effectiveness of their ads and to personalize ad content.

Personal data Retention

We will only keep your personal data for as long as is reasonably necessary taking into consideration our need to answer queries or resolve problems, any other purpose outlined above or to comply with legal requirements under applicable law(s). This means that we may retain your personal data for a reasonable period after, for example, the end of the contract with Lupin, or after your query has been addressed. After this period, your personal data will be deleted from all Lupin systems.

We remind you that you have a right to request to have your personal data deleted at any time.

Your rights

You have a right to:

- Request access to your personal data and request details of the processing activities conducted by Lupin by contacting Webmaster.
- Request that your personal data is rectified if it is inaccurate or incomplete
- Request erasure of your personal data in certain circumstances.
- Request restriction of the processing of your personal data by Lupin in certain circumstances.
- Object to the processing of your personal data in certain circumstances.
- Receive your personal data in a structured, commonly used and machine-readable format in certain circumstances.
- Lodge a complaint with the relevant supervisory authority.
- Object to, and not to be subject to a decision based solely on, automated processing (including profiling), which produces legal effects or significantly affects you.

- Withdraw any consent you may have provided to us at any time by contacting us.

To exercise the rights outlined above in respect of your personal data you may also our Data Protection Officer Katy.Ritzmann@gsk.de.

External website links

This site contains links that may lead you to other sites. This Privacy Policy applies only to Lupin's websites. Lupin may provide links to other websites, which we believe, may be of interest to our visitors. We try to ensure that such websites are of the highest standard. However, Lupin does not guarantee the standards of every website link it provides or be responsible for the contents of non-Lupin sites. The risk of accessing such websites is solely yours. Be careful when accessing these links, as Lupin is not responsible for the privacy practices or the content of such other Websites.

Changes to our privacy policy

This privacy policy was last updated 27-05-2019 and we will notify you of changes we may make to this privacy policy, where required however we would recommend that you look back at this policy from time to time to check for any updates.

Our Contact details

Lupin is the controller of data for the purposes of GDPR. If you have any concerns as to how your data is processed, you can contact our Data Protection Officer Katy.Ritzmann@gsk.de.