



## **Privacy Notice – marketing and promotional activities**

### **1. Important Information and Who We Are**

#### **What is the purpose of this document?**

Glenmark Pharmaceuticals Limited including its subsidiaries, affiliates, successors, assigns and representatives worldwide (“Glenmark”) respects your privacy and is committed to protecting your personal data.

In this privacy notice we will explain how we handle personal data that we or our service providers process through your interactions with us or them. This Privacy Notice covers the collection, use and disclosure of personal data collected in relation to Glenmark’s marketing practices. This Privacy Notice also describes your legal rights with respect to such activities.

#### **Application and Scope**

This privacy notice is global in scope and applies to all Glenmark entities. This privacy notice does not apply to Glenmark Life Sciences Limited, Ichnos Sciences Inc., or their subsidiaries.

Our marketing and promotional activities are not intended for children. We do not knowingly collect or process data relating to children.

#### **Changes**

We may modify this privacy notice without warning. You should therefore periodically visit this page to be sure that you have read our most current privacy notice and to ensure that you are always aware of what information we collect, how we use it and under what circumstances, if any, we may share it with other parties.

### **2. The Personal Data We Collect About You**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The information we may gather about you may include but is not limited :

**Identity Data** first name, last name, title, job title, qualifications, date of birth, email address, telephone number and business address;

**Technical Data** internet protocol (IP) address, MAC address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;

**Usage Data** information about how you use our website, products and services; and

**Marketing and Communications Data** your preferences in receiving marketing and promotional material from us and our third parties and your communication preferences.

### 3. Ways in which Personal Data is Provided

We use different methods to collect data from and about you including through automated technologies or interactions.

**Information you provide.** We may ask you to provide, or you may choose to provide information. Such information may be provided to us at various times, including, without limitation: when you fill in specific forms (online or offline); when you register on a Glenmark website or on other Glenmark platforms; when you register for an event or webinar via a Glenmark website/platform or by contacting us offline; and when you request information about or receive products and services from Glenmark.

**Information collected through your business relationship with Glenmark.** We may collect information from you through your business relationship with Glenmark, including when you have shown interest in Glenmark (e.g. during business meetings, events or conferences with Glenmark employees and/or interactions with our sales representatives).

**Information collected automatically.** If you interact with our website or other online portals and systems, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. Please see our [Cookies Policy](#) for further information.

**Information collected automatically from combined sources.** In some cases, personal data that you provide to us via Glenmark websites, apps and/or platforms may be combined with personal data collected through your business relationship with Glenmark employees and/or our sales representatives. In such cases, the data may be used for all purposes defined in the “How We Use Your Personal Data” section below, unless and until you notify us that you do not longer wish us to use the data for these purposes.

### 4. How We Use Your Personal Data

Within the scope of marketing and promotional activities we may collect and store your personal information using a Glenmark Customer Relationship Management (CRM) system or otherwise. Your personal data may be used for the following purposes:

- to answer your enquiries and meet your requests, for instance to send you requested information.
- to conduct research and development.
- to promote our business interests, for example for data analysis, for checks, for the development of new products and services.

- To send you targeted emails but only when you opt-in to any direct marketing activities and for as long as you do so.
- To present you with product information and services tailored to you, as well as to identify the effectiveness of our marketing campaigns. In this respect, we adhere strictly to local legal requirements and as far as possible only use anonymised data, which does not allow inferences to be made about you as an individual. National laws may provide separate preconditions for the individual uses of personal data.
- to provide important information about our business relationship with you, about our terms of business or use or to send you other information related to processing of your personal data.
- to respond to legal requests from administrative or judicial authorities, in accordance with applicable laws.

Processing activities on your personal data may be performed by Glenmark either manually or automatically according to the purposes indicated above and for the time strictly necessary to pursue these purposes.

## **5. Our Legal Basis for Using Your Data**

We will only use your personal data when the law permits us to do so and for the purposes of marketing and promotional activities such contact typically requires your prior consent.

If you have given consent to our use of your personal information for marketing and promotional activities, you are entitled to withdraw this consent at any time by unsubscribing via the link provided within marketing emails we send to you or by contacting us at [dpo@glenmarkpharma.com](mailto:dpo@glenmarkpharma.com).

## **6. Disclosures of Your Personal Data**

### **Who has access to personal data**

If necessary and where legally permitted to do so, we may pass your personal data to the following third parties:

**Companies that form part of the Glenmark group**, but only for the purposes identified in this privacy notice and within the scope of permitted transfers. In any event, we remain fully responsible for the handling of personal data for shared use and will ensure this is done so in accordance with applicable privacy laws.

**Our business partners**, but we will only transfer your personal data if we have your consent or it is permitted by law. In addition, we do not allow our business partners to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**Service providers**, who provide services such as CRM systems, online file or website hosting and moderation, the processing of your feedback and reviews of products and services, the provision of call centre services, the hosting of mobile applications, data analysis, infrastructure provision, IT services, delivery services for e-mails and direct marketing, in order to carry out these services. Here,

too, the service providers are contractually obliged to only use the personal data according to our specifications before the personal data is transferred.

**Third parties** to whom we are required to transfer personal data because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding.

### **International Transfers**

The personal data we collect from you may be stored, accessed or processed in any country where we maintain branches or the aforementioned parties are located, for example in India (where our parent company, Glenmark Pharmaceuticals Limited, is located). Whenever we export your personal data, we ensure a similar degree of protection is afforded to it by using specific contracts that ensure the importer of such data has appropriate and equivalent safeguarding measures in place.

## **7. How We Protect Your Data**

We have put in place appropriate technical, organisational and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, business partners, service providers, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. How Long We Will Use Your Data For**

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **9. Your Legal Rights**

Under certain circumstances, you may have rights under data protection laws in relation to your personal data:

**Request access to your personal data.** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to

delete or remove your personal data where you have successfully exercised your right to object to processing (as explained below). Note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. In such circumstances we may reserve the right to delete your personal data rather than hold it but restrict processing, where our processes are not set up to enable a restriction.

**Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Request information about your personal data.** On request, we will disclose to you the categories of personal information Glenmark collected, used or shared about you, which third parties were involved (if any) and why they collected, used or shared that information.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## **10. Sale of data**

We do not sell your personal data to other businesses or third parties under any purposes of processing.

## **11. Revisions to this privacy notice**

Glenmark may update this privacy notice from time to time. In order to keep up to date with the ways in which Glenmark handles your personal data we request that you visit and review the relevant privacy notices on our [privacy portal](#) on a regular basis.

## **12. Data protection officer**

We have appointed IG Smart as our global Data Protection Officer (DPO) to oversee compliance with this privacy Notice and our privacy obligations generally. If you have any questions about this Notice or how we handle your personal information, or wish to exercise any of your rights contained hereunder, please contact us by email at [dpo@glenmarkpharma.com](mailto:dpo@glenmarkpharma.com) or alternatively contact our global DPO directly at [dpo@ig-smart.com](mailto:dpo@ig-smart.com).

### **13. Complaints**

If you are unhappy with the way in which we have processed your personal data please address any complaints to [dpo@glenmarkpharma.com](mailto:dpo@glenmarkpharma.com). In any case, you also have the right to lodge a complaint with the relevant supervisory authority which can be found at <https://pdpecho.com/the-list/>