

## DR REDDY'S LABORATORIES GLOBAL PERSONAL DATA TRANSFER FRAMEWORK – OVERVIEW

Dr. Reddy's Laboratories ["DRL"] has established a **Global Personal Data Transfer Framework** ["**Framework**"] to ensure lawful and structured intra-company personal data transfers across its global subsidiaries and affiliates [collectively "**Entities**"] as well as its Representative Offices ["**ROs**"]. This document provides guidance on understanding the framework, its hierarchy, and the supporting **Tertiary Agreements** [TA].

### I. Purpose

The Framework aims to:

- Standardize and ensure lawful intra-company cross-border personal data transfers.
- Maintain consistency in personal data protection practices across DRL's Entities.
- Establish a structured approach for compliance with global personal data protection regulations.
- Provide a high-level view of measures, standards, and procedures to be followed.

### II. Structure

**Framework:** The Framework outlines the general principles and procedures that Dr. Reddy's, its Representative Offices (RO) and the Entities [including SVAAS Wellness Ltd] will follow for intra-company global personal data transfers. It provides a high-level view of the measures and standards to be maintained across all entities.

**Tertiary Agreements:** The Framework is supplemented by 'tertiary agreements' between the parties to the Framework [including DRL, the ROs, SVAAS and the Entities] – each operating under the ambit of the Framework.

### Exhibits included in the Framework:

Exhibit	Details
A	List of Representative Offices of Dr. Reddy's
B	List of Subsidiaries and Affiliates
C	Categories and Purposes of Personal Information Collected
D	Technical and Organizational Measures
E	Categories of Sub-Processors

### III. Order of Precedence

In case of conflicts between the Framework and Tertiary Agreements, the order of precedence is:

1. **Global Data Transfer Framework** – This shall take priority over any individual agreement.
2. **Tertiary Agreements [TA]** – These agreements must align with the Framework but address specific operational/jurisdictional requirements.

**[Note:** Where Standard Contractual Clauses [‘SCCs’] such as in EU/ UK GDPR are applicable, the provisions of the SCCs shall prevail over the Framework and Tertiary Agreements]

### IV. Interpretation

The above-mentioned steps are recommended to ensure compliance with the overall global personal data transfer mechanism:

- Read the Framework to understand the overarching principles.
- Read the specific Tertiary Agreement applicable to the personal data transfer in question.
- Ensure alignment between the two, referring to the Framework in case of any variations.

### V. Controls

To ensure we transfer personal data within DRL, its subsidiaries, affiliates and RO's in accordance with the framework. The following controls will be used:

#### Internal

- Regular trainings for concerned employees and company-wide communications that increase awareness on the standards that should be considered when internally transferring personal data across borders.
- Ongoing Privacy Impact assessments for all processes that involve internal transfer of personal data.
- Country-wide Data Privacy Control assessments including but not limited to creation of Records of Processing Activities (RoPA) involving internal transfer of personal data.
- Working with Regional General Counsels to identify new Dr. Reddy's legal entities, ROs and subsidiaries being established.

#### External

- Monitoring of changes to local Data Protection laws by concerned DP Partners to ensure the terms in the agreements are up-to date.

### VI. Key Considerations

- Ensure that all personal data transfers between DRL, ROs, SVAAS and the Entities fall within the scope of the Framework and adhere to the principles laid down in the same.
- Regularly review Tertiary Agreements to maintain compliance with global data privacy laws.