

## General Privacy Notice for Dr. Reddy's Employees (Brazil)

**Last revision date:** March 2025

The Privacy Notice for employees in Brazil ("Privacy Notice") is addressed to all individuals employed by Dr. Reddy's Laboratories or its affiliates in Brazil ("Dr. Reddy's"). Dr. Reddy's and its affiliates as your employer is responsible for the processing of your personal information as it decides why and how it is processed, thereby acting as 'Data Controller'. In this notice, "we" or "us" refers to Dr. Reddy's and its affiliates.

Please read this Privacy Notice which sets out how and in which context we are processing your employment-related personal information and explains your rights in respect to processing such information.

We take the privacy of all individuals seriously and are committed to ensuring that your personal information we collect is processed and protected in accordance with applicable data protection laws and Dr. Reddy's policies and standards.

Should you have any further questions related to processing of your personal information, we invite you to contact [juridico.brasil@dr.reddys.com](mailto:juridico.brasil@dr.reddys.com)

### 1. What information do we have about you?

We may collect various types of personal information about you, including supporting documents where required. This may include:

- **your identification related information:** e.g., name, email Id, mobile (option to communicate via Whatsapp), citizenship, gender, , date and place of birth, marital status, , disability applicability, passport number and validity , current and permanent address, photo.
- **information of your family members and nominees:** e.g., mother's name, where applicable your date of marriage and spouse's name, where applicable your child's name, personal details of your family members as nominees for medical insurance and other statutory and employment benefits related provisions, and emergency contact name and contact information.
- **your financial and compensation related information** e.g., , Bank and account holder details.
- **your education, and experience related information:** highest and second highest qualification, specialization, College/institution name and period, educational certificates – high school and above, total years of experience, joining and relieving date designation (joining and leaving).
- **your electronic identifiers:** ID card/badge number, login credentials including work phone number to enable multi-factor authentication, IP Address, online identifiers such as cookies, logs, access and connection times, access rights, audio or visual recordings such as enabled through use of security cameras.
- **your national /citizenship identification and social security information:** such as RG, CRNM, taxpayer register (CPF), social security (NIT/PIS), FGTS, título de eleitor, certificado de reservista, and passport numbers, and other such government issued identifiers.
- **Biometrical Information:** to enable you to join Dr. Reddy's premises or systems.
- **your individual or group photos, audio, video recordings** captured in context of internal and external events and virtual meetings where you may participate.
- **your feedback, comments or preferences** e.g., those received through internal surveys, collaboration tools, events, meetings, townhalls, and DRL social media accounts.
- **information related to your job role,** and that necessary for administration of your employment: job title/ number, business unit, department, managers, buddy and subordinates' information, employment dates including dates of joining, promotion, level and position change, work schedule, performance and values and behaviors evaluation

and its outcome, attendance data incl. leaves availed, health related information, career aspirations, and recognitions received.

- where necessary and legally permitted, information such as your health/medical information, diversity related information, information collected with regard to investigations of misconduct, information and documentation related to individuals involved in judicial proceedings, legal disputes.
- more generally information about the activities you are carrying out in your professional capacity.

Please note that some of the information listed above may be classified as sensitive personal (or special category) information under applicable laws. This may include information such as your health and medical information, minor's data, data collected regarding complaints and investigations of misconduct etc.

## **2. For which purposes do we use your personal information?**

### **2.1 Legal basis for the processing**

We need to process your personal information primarily to fulfil our contractual obligations with respect to your employment contract with us and to comply with legal and regulatory obligations under the applicable laws.

In particular we may rely on any or a combination of the following legal basis to process your personal information:

- the processing is necessary to perform our contractual obligations towards you,
- the processing is necessary to comply with our legal or statutory obligations,
- we have obtained your prior consent where required.
- the processing is necessary for our legitimate interest and does not unduly affect your interests or fundamental rights and freedoms. When processing your personal information on this basis, we strive to maintain a balance between our legitimate interests and your privacy. Examples of data processing performed based on our legitimate interests include:
  - to perform general HR administration
  - to prevent misuses of our internal services or systems, including security of our information assets
  - to perform investigations related to potential or actual violations of our internal policies and codes.
  - to gather insights in an aggregated manner when you interact with our systems or respond to internal surveys (e.g. related to Dr. Reddy's processes or culture)
  - to use your images and videos for internal or external use
  - to offer our products and services to our business partners or third parties, by sharing your official contact details or by designating you as a contract signatory.
- the processing is necessary to protect your vital interests, or those of another person.

### **2.2 Purposes of the processing**

We may process your personal information for the following purposes:

- to administer your employment contract with us and fulfil our obligations therein,
- to provide the benefits under law, such as but not limited to meal allowance, health insurance, life insurance, among others;
- for personnel administration (such as performing employment & background checks, creating & maintaining employee directories, record keeping, relocation and travel arrangements, benefits and absence management, deputation etc.),
- to carry out tasks in relation to our legal and regulatory obligations, including inspections, audit and reporting (such as income tax, audits, litigation, medical checkups, misconduct or fraud, inspections by regulatory authorities),

- for performing pre-employment medical checkups to assess role fitment and to promote employee wellbeing.
- for your learning and skill development,
- for your payroll administration.
- for facilitating and administering social and financial services related to your employment (such as travel, accident, health, medical insurances),
- to carry out your ongoing performance reviews and values and behavior evaluation
- to seek your feedback and obtain insights about our processes, organization and culture through surveys,
- to allow you to participate in conferences and events, managed or sponsored by us,
- to publish content from you and relating to you, including without limitation in newsletters, magazines, the internet (e.g., our website or social media handles), events, interviews, brochures and articles.
- to perform general analytics related to employment and organizational culture related insights and to improve our internal processes. We may also utilize emerging technologies to gather such insights,
- to manage your requests or inquiries, also after discontinuation of your employment with Dr. Reddy's,
- for security, safety, health monitoring where required such as to protect unauthorized or unintended disclosure of our intellectual property or confidential information, to promote employee wellbeing.
- for communicating with you for business purposes and business continuity including that during emergencies.
- for handling internal complaints related to violation of codes or misconduct
- to manage divestments, mergers and acquisitions involving our company,
- for any other purposes imposed by law and authorities.

### **3. Who has access to your personal information and to whom are they transferred?**

We may share or transfer your personal information within Dr. Reddy's and its affiliates or to third parties outside the company, including those indicated in this notice.

In the course of our activities and for the same purposes listed in this Privacy Notice , your personal information can be accessed by or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- Our employees (including HR and other departments or affiliates of Dr. Reddys only on a need-to-know basis)
- Our contracted third parties (including IT providers, benefits providers, insurance brokers and providers, payroll providers, staffing providers, auditors, consultants, collaboration or business partners, banking, insurance and healthcare agencies)
- Our advisors and external lawyers, including in the context of the sale or transfer of any part of our business)
- Any third party to whom we may assign or novate any of our rights or obligations.

The above-mentioned third parties are contractually obliged to protect the confidentiality and security of your personal information, in compliance with applicable laws and our policies and standards. This includes those instances where your personal information may be processed, accessed, or stored in a different country which may by default not offer the same level of protection of personal information. In case your personal information is transferred processed, and stored in countries outside Brazil, we ensure that such transfers comply with the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados - LGPD) and that adequate safeguards are in place to protect your personal data. These safeguards may include standard contractual clauses, binding corporate rules, or other legally recognized mechanisms to ensure the protection of your data. If you have any additional concerns related to the manner which your personal information is being transferred, please write to [juridico.brasil@drreedys.com](mailto:juridico.brasil@drreedys.com) or [dataprivacy@drreddys.com](mailto:dataprivacy@drreddys.com).

We ensure that transfers to another affiliate or subsidiary of Dr. Reddy's take place only after ensuring compliance with applicable laws and that your information is always protected in line with our global policies and standards.

We may have to disclose your personal information to government agencies, courts, and designated third parties specified if we are required to do so by applicable law, regulations, court orders or decisions.

#### **4. How do we protect your personal information?**

We have implemented appropriate technical and organizational measures to provide an adequate level of security and confidentiality of your personal information.

The purpose of these measures is to keep your personal information secure and to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access, and against other forms of unlawful forms of processing.

More information on Dr. Reddy's Information Technology/ Information Security Management System (ISMS) policies can be found on our intranet portal (ihub)

#### **5. How long do we store your personal information?**

Your personal information will only be retained for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal or regulatory requirements. When this period expires, your personal information will be de-identified or anonymized or completely removed from our systems and repositories.

Personal information collected and processed in the context of a dispute are deleted or archived i) as soon as settlement has been reached, ii) once a decision in last resort has been rendered or iii) when the claim becomes time barred.

#### **6. What are your rights and how can you exercise them?**

If you wish to exercise your privacy rights, such as requesting information of your personal information, a copy thereof, its correction or deletion, or if you wish to object to processing of your personal information (partially or in its entirety), including objection to profiling and automated decision-making contact HR team or [juridico.brasil@drreddys.com](mailto:juridico.brasil@drreddys.com). Your inquiry is subject to the conditions and limits set forth in the law, and to obligations or legitimate interest that Dr. Reddy's may have.

Whenever we process your personal information, we take reasonable steps to keep your personal information accurate and up to date for the purposes for which it was collected. If you need personal information to be corrected in our systems, please contact HR team or [juridico.brasil@drreddys.com](mailto:juridico.brasil@drreddys.com).

If you wish to know about Data Privacy or have further data privacy related questions, please contact your Data Privacy Partner. To find more information on Data Privacy at Dr. Reddy's please visit the Data Privacy page on our intranet (iHub). If you have any additional concerns related to the manner which your personal information is being processed by us, please write to [juridico.brasil@drreddys.com](mailto:juridico.brasil@drreddys.com) or [dataprivacy@drreddys.com](mailto:dataprivacy@drreddys.com).

#### **7. How will you be informed of the changes to the Privacy Notice?**

We may change or update this Privacy Notice from time to time by posting revised versions on our intranet (ihub) – indicated by ‘Last Revision date’ at the top. Please keep checking this notice occasionally so that you are aware of any changes.