

## Privacy Notice for Employees – Malaysia

**Last Updated:** November 2024

This Employee Privacy Notice ("Privacy Notice") is addressed to all individuals employed by Dr. Reddy's Laboratories and its subsidiaries and affiliates in Malaysia ("Dr. Reddy's"). As your employer, Dr. Reddy's is responsible for the processing of your personal information as stipulated under Malaysia's Personal Data Protection Act 2010 ('PDPA') (and its amendments). In this notice, "we" or "us" or "our" refers to Dr. Reddy's, its subsidiaries, and affiliates.

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

We take the privacy of all individuals seriously and are committed to ensuring that your Personal Information collected by us is processed and protected in accordance with the applicable data protection laws, including the PDPA, any other related rules and regulations governing the processing of Personal Information, as well as Dr. Reddy's policies and standards.

As your employer, Dr Reddy's collects information about you, and where applicable, to the extent permitted by law, about your dependents. The information that we collect about you generally includes, personal details, including sensitive personal information, documentation required under immigration laws, financial information and education and work history (collectively, "**Personal Information**"). If you provide Personal Information about your dependents to us, you represent that you have obtained your dependent's consent, or in the case of a child have given your consent, to provide such Personal Information in accordance with this Privacy Notice and they have been notified of the content of this notice.

Should you have any further questions related to processing of your personal information, while you are being onboarded or as an employee of Dr. Reddy's, you can reach out to your local HR representative.

### 1. What Personal Information do we collect from you?

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

- **your contact and identification related information:** e.g., name, email Id, mobile number (option to communicate via channels such as WhatsApp), citizenship, race, gender, date and place of birth, marital status, government issued ID number, social security number, disability status, passport number and validity, current and permanent address, and photograph for identification purposes and/or for statutory requirements such as reporting in terms of the Employees Provident Fund Act 1991, Employees' Social Security Act 1969, and Employment Insurance System Act 2017 .
- **personal information of your family members and nominees:** e.g., parent's name, where applicable your date of marriage and spouse's name, contact information and national IDs, when you register them as dependents or nominees for medical insurance and provident fund & associated services like life cover, income disability benefit, for availing employment benefits, while registering name and contact information for emergencies or per any other statutory requirements.

- **your financial and previous compensation related information** e.g., last drawn fixed and variable salary (TCC), Bank and account holder details, pay slip from your current/most recent employer.
- **your education, and professional experience related information:** e.g., highest and second highest qualification, specialization, College/institution name and period, marks (% or CGPA), educational certificates – high school and above, total years of experience, joining and relieving date, designation (when joining and leaving) and notice period of current/most recent organization.
- **your electronic identifiers:** e.g., ID card, biometric information, login credentials including phone number, device information of phone and laptop used for work, online identifiers such as cookies, logs, access and connection times, access rights, audio or visual recordings such as those enabled through the use of security cameras in our offices.
- **your individual or group photos, audio, video recordings** captured in context of internal and external in-person events as well as virtual meetings where you may participate
- **your feedback, comments, or preferences** e.g., those received through internal surveys, collaboration tools, events, meetings, town halls, and our social media accounts.
- **information related to your job role, and that is necessary for the administration of your employment:** job title/ employee ID, 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 including leaves availed, career aspirations, and recognitions received in order to, *inter alia*, monitor and assess the performance of your duties.
- Where necessary and legally permitted, diversity related information, information collected with regard to investigations of misconduct, information and documentation related to individuals involved in judicial proceedings, and legal disputes.
- Any other information about the activities you are carrying out in your professional capacity.

Please note that some of the information listed above may be categorized as Sensitive Personal Data (as defined under the PDPA). This may include information such as your health and medical information, bank account details, 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

As your employer, we process your Personal Information after obtaining your consent in accordance with the PDPA.

Where we are not required to obtain your consent, we may nevertheless process your Personal Information for the following lawful purposes:

- processing is necessary for us to carry out actions for the conclusion or performance of a contract that you have entered into with us,
- the processing is necessary for our legitimate interests, which do not unduly affect your interests or fundamental rights and freedoms,
- processing is undertaken for information that is available publicly
- processing is necessary to comply with our legal or statutory obligations,
- processing is necessary for our compliance with any judgment or decree, or order issued under any law,

- processing is necessary for responding to a medical emergency,
- processing is necessary to provide medical treatment or health services during an epidemic, outbreak of disease, or any other threat to public health,
- as your employer, processing is necessary for the purpose of your employment, providing you benefits and services, or safeguarding us from loss or liability. Examples of such processing includes:
  - 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, fraud and unethical or unlawful behavior including those raised in line with of our Ombudsperson Policy.
  - 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 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.
- processing is necessary for any other legitimate uses as allowed under the PDPA.

## 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,
- for personnel administration (such as performing employment & background checks, creating & maintaining employee directories, record keeping, relocation and any company specific travel arrangements, benefits and absence management, deputation etc.),
- to ensure that our Personal Information and that of our clients, customers, suppliers, etc. are secure, protected and treated confidentially, and provide a safe workplace by restricting access to our offices, laboratories, workspaces and/or buildings.
- to carry out tasks in relation to our legal and regulatory obligations, including inspections, audit and reporting (such as income tax, audits, disputes including litigation/arbitration, medical checkups, misconduct or fraud, inspections by regulatory authorities),
- 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, organisation, 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 newsletters, magazines, the internet (e.g., our website or social media handles), events, interviews, brochures, and articles,
- to perform general analytics related to employment such as organizational culture related insights, to ensure security of our intellectual property, and to improve our internal processes, including those gained using emerging technologies,
- to manage your requests or inquiries, also after discontinuation of your employment with us,

- for the security and safety of your information, where required such as to protect unauthorized or unintended disclosure of our intellectual property or confidential information,
- for the promotion of your physical and mental wellbeing during your employment with us,
- for communicating with you for business purposes and business continuity including that during public emergencies,
- for handling misconduct and any violations of our code of business ethics,
- to manage divestments, mergers and acquisitions involving our company, and
- for any other purposes where we have a legitimate interest or is imposed as a requirement under the applicable law and regulatory 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 Privacy Notice.

During the course of our activities and for the same purposes listed in this Privacy Notice, your Personal Information may be accessed by or transferred to the following categories of recipients, on a need-to-know basis to achieve such purposes:

- Our employees inside and outside Malaysia (including HR, Finance and other departments or affiliates of Dr. Reddy's only on a need-to-know basis)
- Our contracted third parties, (including IT providers, payroll and staffing providers, auditors, consultants, collaboration or business partners, banking, insurance, and healthcare agencies)
- Our advisors and external lawyers, (including that related to 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 obligated, when required, 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 to your Personal Information.

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 Personal 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.

We take reasonable steps to keep your Personal Information accurate and complete. You should notify us of any changes to your Personal Information by contacting your local HR representative or through MyProfile section on iHub.

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?**

We will take all practical steps to ensure that your Personal Information will not be kept for longer than is necessary for the purpose for which it is used or is to be used. In certain cases, laws or regulations require us to keep records for specific periods of time, including following termination of our employment relationship with you. In other cases, records are retained in order to administer our employment relationship with you, fulfil our contractual or statutory obligations or resolve queries or disputes that arise from time to time.

When a specific 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, or iv) in accordance with the applicable laws and regulations.

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

If you wish to exercise your privacy rights, such as requesting details of your Personal Information, a copy thereof, its correction or deletion, or if you wish to withdraw your previously provided consent, contact your local HR representative. Your inquiry is subject to the conditions and limits set forth in the law, and to obligations that Dr. Reddy's may have.

If you wish to know about our Data Privacy practices 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).

You can also contact our Data Privacy Office at [dataprivacy@drreddys.com](mailto:dataprivacy@drreddys.com) if you wish to register any grievances regarding the performance of our obligations in relation to your Personal Information or rights.

#### **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 Updated date' at the top. Please keep checking this notice occasionally so that you are aware of any changes.

#### **8. Provision of Personal Information**

While the provision of Personal Information is voluntary, if you fail to provide certain Personal Information when requested, Dr. Reddy's may not be able to, as applicable, continue our communications with you, assess your suitability for employment with us, process your application,

communicate with you in relation to your application and, in the event that your application is successful, manage and maintain your employment relationship with Dr. Reddy's.

#### **9. Consent**

We trust that you have read and understood the statements and terms in this Privacy Policy. By providing and continuing to provide your Personal Information to us, communicating, accessing our website and/or participating in our events, you declare that you have read, understood and accepted the statements and terms herein and you agree to Dr. Reddy's processing of your Personal Information in accordance with this Privacy Notice.