

## Privacy Notice for Employees – United States

**Last Updated:** April 2024

This Employee Privacy Notice ("Notice") is addressed to all individuals employed by Dr. Reddy's Laboratories and its subsidiaries and affiliates in the United States ("Dr. Reddy's"). This Notice serves as a Notice at Collection for purposes of the California Consumer Privacy Act ("CCPA"). As your employer, Dr. Reddy's is responsible for the processing of your personal information. In this Notice, "we" or "us" or "our" refers to Dr. Reddy's, its subsidiaries, and affiliates.

Please read this 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 applicable data protection laws, including the CCPA, as well as Dr. Reddy's policies and standards.

Should you have any further questions related to processing of your personal information, we invite you to contact us at [welcome@drreddys.com](mailto:welcome@drreddys.com), while you are being Onboarded. As an employee of Dr. Reddy's, you can reach out to us via 'Guru' (our query management chatbot).

### 1. What information do we collect from you?

As used in this Notice, "personal information" refers to any information identifying an individual and any information that reasonably can be linked to an identifiable individual. We may collect various categories of personal information about you, including information contained in supporting documents where required. We may also collect personal information of your family members and nominees for the purposes of administering benefits programs, maintaining emergency contact information, or other similar purposes. The categories of personal information we collect may include:

- **Identifiers**, such as name, email Id, mobile number (option to communicate via channels such as WhatsApp), social security number, other government-issued identification number, passport number and validity, current and permanent address, and other similar identifiers. We may also collect electronic identifiers (e.g., ID card/badge number, biometric information, login credentials including phone number, device information of phone and laptop used for work).
- **Characteristics of protected classifications under law**, such as citizenship, gender, disability status, and where necessary and legally permitted, diversity related information.
- **Biometric information** for security purposes.
- **Internet or other electronic network activity** including online identifiers such as cookies, logs, access and connection times, and access rights.
- **Audio, electronic, visual, or similar information**, including audio or visual recordings such as those enabled through the use of security cameras in our offices. We may also collect your individual or group photos, as well as audio, video recordings captured in context of internal and external in-person events as well as virtual meetings where you may participate.
- **Professional and employment-related information**, including your financial and previous compensation related information e.g., last drawn fixed and variable salary (TCC), Bank and account holder details along with a cancelled cheque, pay slip from your current/most recent employer. We may also collect total years of experience, joining and relieving date, relieving letter from your previous employer, employee code from last two organizations, designation

(when joining and leaving) and notice period of current/most recent organization. We may also collect other information related to your job role and/or necessary for the administration of your employment, including 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.

- **Education information**, including highest and second highest qualification, specialization, College/institution name and period, marks (% or CGPA), educational certificates – high school and above.

Please note that some of the information listed above may be considered sensitive in nature. This may include information such as your health and medical information, social security number, passport number, other government ID number, biometric information, bank account details, minor's data, data collected regarding complaints and investigations of misconduct etc.

## 2. From which sources do we collect your personal information?

We collect the foregoing categories of personal information from the following sources:

- We collect this information directly from you when you voluntarily provide it (e.g., as part of your employment application, as responses to surveys, or through other communications). We also collect information from you indirectly via cookies and other technologies.
- We may collect information from other employees (e.g., your manager) or company systems (e.g., security cameras as described above).

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

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 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, misconduct or fraud, inspections by regulatory authorities);
- where permitted by law 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, 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 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 applicable law and regulatory authorities;
- for purposes to which you give your consent.

#### **4. Who has access to your personal information and to whom is it transferred?**

We may disclose 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.

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 (including HR 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 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.

We have procedures designed to 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.

## 5. How do we protect your personal information?

We have implemented appropriate technical and organizational measures intended 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).

## 6. 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.

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

California residents can make the following requests with respect to their Personal Information in accordance with applicable law and subject to exceptions set forth in such applicable law:

- **Access** – You can request that we disclose to you the categories of personal information we collected about you, the categories of sources from which we collected the personal information, the categories of personal information we sold or disclosed, our business or commercial purpose for collecting, selling or sharing the personal information, the categories of third parties to whom we disclosed the personal information, and the specific pieces of personal information we collected about you.
- **Deletion** – You can request that we delete the personal information that we collected from you, subject to certain exceptions.
- **Correction** – You can request that we correct inaccurate personal information that we maintain about you, subject to certain exceptions.
- **Do Not Sell or Share My Personal Information** – You can request that we not sell or share your personal information to or with a third party by clicking the Do Not Sell or Share My Personal Information link, or contacting us using the contact details provided below. For purposes of this Section of the Notice, “sell” means the sale, rental, release, disclosure, dissemination, availability, transfer, or other oral, written, or electronic communication of your personal information to an outside party for monetary or other valuable consideration, subject to certain exceptions in applicable law. For purposes of this Section of the Notice, “share” means transferring, making available or otherwise disclosing your personal information to a third party for cross-context behavioral advertising purposes, subject to certain exceptions in applicable law. We do not knowingly sell or share the personal information of minors under 16 years of age.

We will not discriminate against you because you exercised any of these rights.

A California resident can exercise the rights described above by contacting our HR team at [welcome@drreddys.com](mailto:welcome@drreddys.com), while you are being onboarded. As an employee of Dr. Reddy's you can reach out to us via 'Guru' (our query management chatbot). You can also exercise your rights by calling us at 1-(844) 948-0407.

We may deny certain requests, or fulfill a request only in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or other record keeping purposes.

You may designate an authorized agent to make a request on your behalf. When submitting the request, please ensure the authorized agent is identified as an authorized agent.

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 Officer 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.

#### **8. 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.