

Employee & Contractors Privacy Notice

The Privacy Notice for current and former employees and contractors in the Netherlands ("Privacy Notice") is addressed to all individuals employed and contracted to the following Dr. Reddy's Research and Development B.V. in the Netherlands ("Dr. Reddy's"). This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

We invite you to carefully 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 of 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.

1. Who is responsible for data processing?

The respective (employer) is responsible for data processing

Dr. Reddy's Research and Development B.V.

Dr. Reddy's 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.

Dr. Reddy's is the "data controller" this means that we are responsible for deciding how we hold and use personal information about you. We have a duty under GDPR to notify you of the information contained in this privacy notice.

2. What information we hold

Dr. Reddy's collects and processes a range of information about you this includes following list:

- your name, address and contact details, including email address and telephone number, photograph date and place of birth and gender;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Dr. Reddy's and reference letters from previous employers;
- information related to your job role, and that necessary for administration of your employment: job title/ number, business unit, department, managers, 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.
- details of your bank account and Citizen Service Number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in certain circumstances.
- details of your schedule (days of work and working hours) and attendance at work;

- details of periods of leave taken by you such as holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- assessments of your performance, including appraisals, performance reviews, training you have participated in, performance improvement plans and related correspondence; diversity related information, information collected with regard to investigations of misconduct, information and documentation related to any judicial proceedings, legal disputes; and

3. What are the lawful bases for processing?

We process your personal data in compliance with GDPR and other applicable laws. The purpose of the data processing is the implementation of the employment relationship. The lawful bases of processing are set out in Article 6 of GDPR.

3.1 Purposes of employment relationship

Dr. Reddy's processes your data to enter to fulfil the employment contract with you and the resulting mutual obligations. This includes but not limited to the maintenance of the personnel file, payroll accounting, project time recording, if applicable, but also the provision of official means of communication.

3.2 Processing based on consent

If you have given us your voluntary consent to the collection, processing or transfer of certain personal data in individual cases, then this consent forms the legal basis for the processing of this data. We process your personal data on the basis of your consent, e.g. when using your photo.

3.3 Compliance with a legal obligation

As a company, we are subject to various legal obligations. In order to fulfil these obligations, it may be necessary to process your personal data, for example to implement monitoring and reporting requirements with authorities (e.g. tax offices or social security institutions), carry out identity checks or for the purposes of prevention of criminal offences.

3.4 Pursuit of legitimate interests

In certain cases, we process your data to pursue legitimate interest of ours. We process your personal data for legitimate interest purposes, such as to ensure IT security and operations, to assert, exercise or defend legal claims arising from the employment relationship, to grant voluntary benefits or for internal company communications, e.g. anniversaries. Within the scope of legitimate interest, we process your personal data within the group of companies in particular for internal administrative purposes or group-wide planning and control of processes and resources.

4. What we do with the information

Dr. Reddy's has a legitimate interest in processing personal data before, during and after the end of the employment relationship.

Processing employee data allows Dr. Reddy's to carry out the following:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that Dr. Reddy's complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- 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.
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.
- Additionally, we process employee's personal data to comply with legal obligations and to provide benefits such as health insurance and pension schemes.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes).

5. Who are the recipients of data?

When processing your personal data as an employee, Dr.Reddy's may use service providers.

Usually in such a case, these service providers act as data processors.

In order to fulfil our contractual and legal obligations and pursue our legitimate interests or on the basis of your consent, your personal data is disclosed to various public or internal bodies, including external service providers. We contractually ensure that the recipients comply with the relevant data protection laws.

As Dr. Reddy's is part of a group of companies, we have internal service agreements in force to ensure the recipients comply with European Data Protection Regulation. In the event, third countries are recipients of the data, then we in place the Standard Contractual Clauses, as described in section 6 below.

Depending on such agreements, certain Dr.Reddy's group companies (as Dr. Reddy's Laboratories Ltd in India and Dr. Reddy's Laboratories (UK) Ltd in UK and Dr. Reddy's Laboratories SA in Switzerland shall have access to employees' data for internal administrative purposes, group-wide planning and control of processes and resources. The

above, based on our legitimate interests. Companies within the group of Dr. Reddy's Laboratories Ltd which process data on our behalf as service providers.

In this respect, employee data can be passed onto the following recipients:

- All companies in the group of Dr. Reddy's Laboratories Ltd for internal administrative purposes, group-wide planning and control of processes and resources.
- Companies within the group of Dr. Reddy's Laboratories Ltd which process data on our behalf as service providers.
- External Service providers by instructions who process personal data for the provision of services on our behalf:
 - IT Service providers (e.g. maintenance service providers, hosting providers)
 - Service providers for file and data destruction
 - Payroll service provider
 - Pension service provider
 - Health Insurance provider
 - Travel Insurance provider
 - Relocation service provider
 - Visa service provider

The service providers acting as processors are bound by our instructions with regard to the manner of data processing and are subject to the technical and organisations measures specified by us.

- Other Service providers
- To fulfil the labour contract, we shall transfer your personal data to recipients such as banks.
If the case may be, based on legitimate interests, Dr.Reddy's shall use courier services, printers and the postal service is based on Art 6 para 1.f GDPR.
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- Professionals subject to professional confidentiality, advisors and insolvency administrators
If there is a legitimate interest, personal data may be transferred to professional's subject to professional confidentiality, advisors and insolvency administrators. An assurance of data protection in particular stems from ethical and professional secrecy requirements applicable to doctors, lawyers, accountants, tax advisors or auditors.
- Public offices
In addition, we may be obliged to provide your personal data to further recipients, such as authorities for the fulfilment of legal notification obligations:
 - Financial authorities
 - Social insurance institutions
 - Employment office
 - Immigration office

Insurance and Pension schemes

We shall communicate your personal data to Insurance and Pension scheme suppliers to comply with legal obligations. Those entities act as independent data controllers. Please check their privacy notices to get further information on how they process employees personal data:



6. Transfers outside of the European Union

In principle, personal data in the context of the employment relationship is stored within the United Kingdom and European Union. Countries outside the European Union (and the European Economic Area "EEA") handle the protection of personal data differently than countries within the European Union.

As we are part of an international group of companies owned by the parent company Dr. Reddy's Laboratories Limited based in India, certain employee data is transferred to other group companies outside the EU and EEA, in particular in India, Switzerland and the United Kingdom, for internal administrative purposes or group-wide planning and management of processes and resources. In addition, we use servers and software solutions as well as other services (such as MS365 and DocuSign) which are provided by non-European providers. We also use servers or other resources worldwide; this would mean that your employee data may be transferred to the third country, United States. The continuity of the level of protection of the data when transferred to third countries can be ensured by one of the mechanisms provided for by law, such as EU standard contractual clauses or a decision by the European Commission on the existence of an adequate level of protection of a third country.

In the absence of an adequacy decision, data transfer to and data processing by recipients in insecure third countries is carried out on the basis of appropriate safeguards pursuant to Art. 46 of the GDPR, in particular by concluding standard contractual clauses pursuant to Art. 46 para. 2 c of the GDPR in combination with appropriate security measures.

7. 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](#) . Please make sure to follow all the Company's Policies that are applicable to you.

8. How long do we store your personal information?

We store your personal data as long as it is necessary for the fulfilment of our legal and contractual obligations and other legitimate purposes. In the case of consent-based processing, your data will be processed until your consent is withdrawn and then deleted in accordance with data protection regulations. If storage of the data is no longer necessary for the fulfilment of contractual or legal obligations, your data will be deleted unless its further

processing is necessary for the assertion, exercise or defense of legal claims and/or for the fulfilment of retention obligations under applicable commercial and tax law.

Where Dr. Reddy's engages with third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

9. Your data protection rights

The law gives you a number of rights to control what personal information is used by us and how we can use it. Please be aware that your rights may differ depending on the lawful basis for processing your personal data. As a data subject, you have the right to:

- to be informed as to why your personal data is needed for processing, how we use the data and what will be done with it;
- to access and obtain a copy of your data on request;
- when applicable, you may ask for restriction of the processing. This is mainly used while verifying the accuracy of your data, or if the treatment is deemed unlawful but you decide not to ask for erasure, or in the event the processing of data would no longer be necessary or if you have objected for a processing during the verification whether the company's interest or yours is the one overriding.
- to rectify and change any incorrect or incomplete data; to erase or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- to ask Dr. Reddy's to restrict processing data for a period if data is inaccurate to object, when processing is carried out based on a legitimate interest. In this case you have the right to object to the processing on grounds arising from your situation. In the event of your objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.
- In certain situations, you might also exercise your right to portability but this should be for the data you provided Dr Reddy's with.

If processing is carried out on the basis of a legitimate interest, you have the right to object to the processing on grounds arising from your particular situation. In the event of your objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

You have some obligations under your employment contract to provide Dr. Reddy's with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide Dr. Reddy's with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work and payment details, have to be provided to enable Dr. Reddy's to enter a contract of employment with you. If you do not provide other information, this will hinder the Dr. Reddy's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

You have the right to receive a copy of your personal data held by Dr. Reddy's. This right extends after employment ceases until the file is destroyed at the end of its retention period. Requests should be made direct to HR whilst employed and to the Data Privacy Officer (DPO) thereafter. Requests will be responded to within one month of receipt; proof of identity/entitlement will also be required if no longer employed. The DPO should be contacted if you wish to engage any other data rights such as erasure or portability.

If processing is based on your consent, you have the right to withdraw this consent for that specific processing at any time. If you have consented to the data processing or if a contract exists for data processing and the data processing is carried out with the help of automated procedures, you may have the right to data portability).

To exercise your rights, please contact your DPO by sending an email to be indicating in the subject your country and the right you exercise (i.e. TheNetherlands_Right to rectification)

Email address: dataprivacy@drreddys.com

Furthermore, you have the right to lodge a complaint with the competent data protection supervisory authority.

For operational requests or queries related to employment, please refer to your HR Business Partner or raise a query/ticket to HR as indicated in the intranet.

10. Changes to this privacy notice:

We reserve the right to make any changes and corrections to this policy. Please refer to this policy from time to time to review these and view new additional information.

I, (employee/ contractor name), acknowledge that on (date), I received a copy of Dr Reddy's Privacy Notice for employees and contractors and that I have read and understood it.

Signature

Date

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