

# BIOCON LIMITED POLICY DOCUMENT

## DATA PRIVACY AND PROTECTION GUIDELINE

<b>Policy Title:</b>	<b>Data Privacy and Protection Guideline</b>		
<b>Scope:</b>	Applicable to all employees, trainees/interns, apprentices, contract workforce, vendors, customers, auditors, directors and visitors (collectively called 'personnel') of Biocon Limited and its subsidiaries (termed as 'Biocon' or 'Company' in the policy), except Biocon Biologics Limited and Syngene International Limited		
<b>Policy Version No:</b>	1.2		
<b>Policy Implementation Date:</b>	08-11-2018	<b>Policy Effective Date:</b>	08-11-2018 for initial version 25-08-2023 for this version
<b>Policy Revision &amp; Approval Authority:</b>	Head of IT   Head of Legal   Head of HR		

### Policy Details:

#### 1. Background:

Security of personal data\* collected, processed and stored is of great importance. Possession of personal data by people not intended to have that information could potentially lead to misuse of the data, thereby, causing harm to the individual and/or financial losses to the Company. Many statues/regulations have been introduced, or are in the process of being approved, with an intention to prevent the misuse of personal data of individuals. To ensure security of personal data, it is important to identify the nature of the data being received, processed, managed or stored, and the purpose of its usage. In addition, it is also important to identify the safety and security measures which are implemented by the Company and whether such measures are adequate to mitigate the risk of data loss or misuse.

#### 2. Principles and Guidelines:

The following principles guide our commitment to ensuring data privacy and protection:

- Compliance with applicable regulations, or statutory requirements, on protection of personal data across locations/countries where Biocon operates
- Personal data will be collected in a fair, transparent and lawful manner, and personal identifiable information collected from third parties will be reliable and legally obtained
- Adequate care shall be taken to ensure that personal data collected is sufficiently protected against any breach or loss
- Employees/stakeholders are given adequate training on personal data protection and their responsibility while handling such data
- Adequate care is taken by third parties who collect/manage/process personal data on behalf of Biocon to ensure data safety
- Personal data, which is collected by Biocon, is used expressly for legitimate activities and for the purpose consented by the individual

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- Biocon uses/processes personal data in strict adherence to the contractual, regulatory and applicable laws

### \* Personal Data:

Any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Following is categorized as personal data, which is covered under this document, but is not however limited to:

- Racial or ethnic origin
- Political or ideological opinion or activities
- Religious or philosophical beliefs
- Trade union related views or activities
- Physical or mental health or medical records/history
- Administrative or criminal proceedings and sanctions
- Biometric data (eg., physical, physiological or behavioral characteristics of a natural person which allow their unique identification including, but not limited to, facial images, genetic information, fingerprints, handprints, footprints, iris recognition, handwriting, typing dynamics, gait analysis and speech recognition)
- Financial information/details (such as bank account number, credit card details, etc.)
- Any other PII (Personal Identifiable Information - eg., name, telephone number, date of birth, email IDs, unique government identification number, etc. as may be prescribed | by applicable laws)

Guided by the above principles, Biocon shall ensure the following:

### Collection of Personal Data directly or indirectly from an individual:

- Ensure that data subjects are informed (to the extent applicable, on a case-to-case basis), in writing or by way of electronic means and their explicit consent is obtained before collection/processing of personal data

### Processing and storage of Personal Data:

- Data collected for specified, explicit and legitimate purposes are not processed in a manner that is incompatible with those purposes. Data is processed lawfully, fairly and in a transparent manner
- Embed physical and information technology measures across the organization for preventing data loss, unauthorized access, misuse, alteration, damage or destruction that can occur during the processing and storage of personal data
- Frequent trainings are given to the personnel on the importance of data privacy, integrity and confidentiality

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### Retention of Personal Data:

- Undertake reasonable steps to ensure that no personal data is retained any longer than is necessary or as applicable by any legal requirement
- Take appropriate measures to ensure that records/data which are being deleted after the retention period go through adequate checks, which restrict data leakage

### Data Processing by a third party on behalf of the Company:

- Ensure that there exists a valid contract between the Company and the third party, which has adequate restrictions/clauses on ensuring data protection, and that, data shall be transferred via secured channels only
- Company shall use only third parties providing sufficient guarantee of existing compliance measures or to implement appropriate technical and organizational measures in such a manner that processing/management of personal data will ensure the protection of the rights of the data subject
- Conduct due diligence checks while evaluating third parties before initiating any business activities with them

### 3. Governance:

- Head of Risk and Compliance shall undertake periodic review and update this policy. The Internal Audit team or Risk team shall review compliance to this policy and its effectiveness
- Changes to this policy shall be approved by the Head of Human Resources, Head of IT and Head of Legal
- Head of HR shall ensure periodic training on this policy to all employees, trainees, contract workforce, consultants and apprentices
- Head of Legal shall ensure that the reference to this policy is included appropriately and as applicable in all the contracts and purchase orders which Biocon enters into with business partners
- Any violation of this policy may have significant consequences and will be dealt according to Biocon's Code of Conduct and other relevant policies

### Implementation:

Respective personnel (acting on behalf of Biocon) are responsible for adhering to the principles set out in this policy. They shall familiarize themselves with this policy and shall participate in all training sessions periodically conducted by the Company. Any concerns or non-compliance with this document can be informed to the Risk and Compliance Team or at [privacy@biocon.com](mailto:privacy@biocon.com).

### **Review and amendment:**

Biocon reserves its right to amend or modify this policy, in whole or in part, at any time without assigning any reason.

### **Reference to other relevant policies:**

- Biocon's Code of Conduct
- Biocon's information security policies