

**PERSONAL DATA PROTECTION & PRIVACY POLICY (“PRIVACY
POLICY”)**

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1) PREAMBLE

Caplin Point Laboratories Limited & its Affiliates (“CPL”/ “We”/ “The Company”) are committed to protecting the privacy and security of personal information collected from stakeholders. The protection of privacy in the processing of personal data is an important concern and we are committed to protect personal data.

2) OBJECTIVES

This Privacy Policy sets out the way in which we collect, use, disclose, transfer, and store personal data when any individual use Company’s website, other digital platforms and whenever we collect personal data of individuals.

CPL may periodically change, modify add or remove or otherwise update this Privacy Policy at its discretion, without prior notification. However, we will always handle Personal Information in accordance with this Privacy Policy that was in effect at the time of collection of the Personal data.

3) COLLECTION OF PERSONAL DATA

The term “**Personal Data**” as used in this Privacy Policy refers to information such as an individual’s name, birth date, e-mail address, user name, passwords, mailing address, telephone number, sexual orientation, personal preferences, health & medical records, academic & professional transcripts and other data that can be used to identify and describe an individual. Generally, we will only process the Personal Data as described in this Privacy Policy. However, we reserve the right, to conduct additional processing to the extent permitted or required by law, or in support of any legal compliance.

We collect Personal Data when anyone-

- fills one of our forms or surveys
- submits personal information for any request, issue or inquiry
- submits resume and other personal information in the career section of the website
- communicates to us and expressly provide us with their personal information
- expressly provide additional information about themselves through email or any other mode of communication
- uses other digital platforms provided by the Company
- submits themselves to medical and health related testing

However, we do not expect everyone to share any of their Personal Data while they visit our website and we also do not collect or store any personal data when anyone visits our website. We also do not collect any Personal Data and details connected to an individual’s digital identity, like IP address, user names, social media details etc, automatically whenever an individual visit our

digital platforms, except in cases where we are required to do so in connection with an individual's engagement with the Company under any contract.

4) HOW WE USE PERSONAL DATA

We use Personal Data only for legally permissible reasons which include one or more of these reasons:

- To fulfil a contract, we have with an individual, or
- If we have a legal duty to use an individual's data for a particular reason, or
- When the individual gives consent to it, or
- When it is in our legitimate interests.

Legitimate interests are genuine and fair usage of the Personal Data for business or commercial reasons. The use of such information is subject to privacy notice in effect at the time of use. This may include the following purposes:

- To respond to an individual's requests
- To provide services to an individual including customer service
- To send communications to an individual about us or our affiliates' services and other information that may be relevant
- To communicate with an individual about job or career opportunities about which the individual had inquired
- To ensure that our site and our services function in an effective manner
- To measure or understand the effectiveness of advertising and outreach
- **Marketing and events:** We use personal information to deliver marketing and event communications to individuals across various platforms, such as email, telephone, text messaging, direct mail, and online. If we send a marketing email, it will include instructions on how to opt out of receiving these emails in the future
- **Legal obligations:** We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; fraud; regulatory requirements etc. We may also use personal information to meet internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate. This obligation may be under any applicable law wherever we operate or the relevant individual reside.
Legal obligations may also include responding to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside the country of residence of the individual.

We endeavour to collect only such information that is reasonably necessary to perform services for an individual or to respond to inquiries. Individuals are responsible for ensuring that the information provided is accurate, complete and current; we will take reasonable steps to ensure that the information we collect and use is relevant to its intended use.

5) SECURITY MEASURES

We deploy information security policies and procedures that are aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet business needs, changes in technology, and regulatory requirements. We ensure the following for securing Personal Data:

- We employ reasonable technological, physical and operational security procedures intended to protect Personal data from loss, misuse, alteration, or unintentional destruction
- Security measures are periodically reviewed and updated in an effort to provide appropriate security for all the data collected about an individual
- We place appropriate restrictions on access to Personal Data
- We implement appropriate measures and controls, including monitoring and physical measures, to store and transfer data securely
- We train our employees and contractors, who deal with Personal Data, on best practices on handling Personal Data
- We take steps to ensure that our employees and contractors operate in accordance with Company's information security policies and procedures and any applicable contractual conditions.
- We require, with contracts and security reviews, our third-party vendors and providers to protect any Personal Data with which they are entrusted in accordance with our security policies and procedures

6) WHEN WE DISCLOSE PERSONAL DATA

We shall not disclose, give, sell or transfer any Personal Data to third parties without obtaining the prior permission from the individual concerned unless the disclosure is necessary for compliance of a legal obligation or by an order under the law for time being in force. Whenever we share the Personal Data with a third party, we ensure that the third party receiving the Personal Data shall not disclose it further to any other party and uses it only for the specific purpose for which the Personal Data was shared. We will not publish in any mode, i.e. through social media, written or oral communication, the Personal Data.

When required, we may share the Personal Data among our associated companies and affiliates situated across the world if necessary for the provision of Services, account administration, sales and marketing, customer and technical support, and business and product development etc. However, in all such cases, we will ensure that our employees and contractors are required to follow our data protection and security policies when handling personal data.

Please note that Personal Data shall be shared, without obtaining prior consent of the concerned individual, with Government agencies mandated under the law to obtain information including for the purpose of verification of identity, or for prevention, detection, investigation including

cyber incidents, prosecution, and punishment of offences. Even in such cases, the Company will not publish in any mode, i.e. through social media, written or oral communication, the Personal Data.

7) HOW LONG WE RETAIN THE PERSONAL DATA

We retain Personal Data for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need the Personal Data, we securely delete or destroy it.

8) RIGHT OF ACCESS, CORRECTION AND OBJECTION

- **Right to Access:** An individual who had shared Personal Data or who suspects that his/her Personal Data is with us, can contact us to request the information we hold on the said individual as well as why we have that information, who has access to the information, where we obtained the information from and how the said information is protected. We will respond to the request within 30 (thirty) days of the date of receiving such request.
- **The right to correct and update the information:** If the data we hold on an individual is out of date, incomplete or incorrect, the concerned individual can inform us about the changes required in the Personal Data and the data will be updated.
- **The right to have information erased:** If an individual feel that we should no longer be using the individual's Personal Data or that we are illegally using the Personal Data, the said individual can directly request that we erase the data we hold. When we receive such request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- **The right to object to the processing of personal data:** We will provide an individual with the ability to object to the processing of the said individual's Personal Data if such processing is not reasonably required for a legitimate purpose as described in this policy or compliance with law. Any grievances regarding handling of Personal data shall be addressed to Grievance officer at email id privacy@caplinpoint.net. The Grievance Officer shall redress all the grievances within 30 days from the date of receipt of grievance.
- **The right to withdraw consent:** An individual who had given the consent to the Company for possessing and processing the Personal Data can withdraw the consent at any time prospectively. The individual can withdraw the consent easily by contacting Grievance officer at email id privacy@caplinpoint.net When an individual withdraws the consent, we will ensure that the said data is destroyed or deleted permanently.

9) PERSONAL INFORMATION AND CHILDREN

We always ensure that the Personal Data is only collected from individuals who are legally eligible to enter into a contract and signify their consent for holding and processing of their Personal Data. Any individual who views, requests or shares any information must be 18 years of age or over. We will not knowingly collect, use or disclose Personal Data from a minor under the age of 18, without obtaining prior consent from a person with parental responsibility (e.g., a parent or guardian) through direct off-line contact if available. We will provide the parent with (i) notice of the specific types of personal data being collected from the minor, and (ii) the opportunity to object to any further collection, use, or storage of such information subject to availability of the contacts of parent. We abide by laws designed to protect children.

Contact Us

In case of any queries or complaints about Company's compliance with this Privacy Policy, or any recommendations or comments to improve the quality of this Privacy Policy, please email us at privacy@caplinpoint.net

Last Updated on 27 th May 2023
