

Sun Pharmaceutical Industries, Inc. Privacy Policy Supplemental Notice for California Consumers

Last Updated June 15, 2023

Why?	<p>The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act and its implementing regulations (collectively, the “CCPA”), gives California residents the right to know what personal information Sun Pharma collects about them, including whether it is being sold or disclosed to third parties. The CCPA also grants certain rights to California residents, including the right to delete their personal information (subject to certain exceptions) and the right to prevent Sun Pharma from selling their personal information or sharing it for cross-context behavioral advertising. Companies are prohibited from retaliating or discriminating against consumers for exercising their rights under the CCPA.</p> <p>All companies need to collect and share consumers’ personal information for everyday business purposes, marketing, and maintenance of the safety, security, and integrity of their websites and other assets, among other reasons. This Supplemental Notice provides the information required under the CCPA and applies to both Sun Pharma’s online and offline activities. For more information about how we collect, use, and share information through our websites and online services, please review our Privacy Policy.</p>
What?	<p>The types of personal information we collect and disclose depends on your relationship and interaction with Sun Pharma. Please review the Consumer Type below that applies to your relationship or interaction with Sun Pharma to learn about the categories of personal information we collect or have collected about you in the preceding 12 months. We also provide information concerning the categories of sources from which the personal information is/was collected, the purpose for collecting the personal information, and the categories of third parties to whom we disclose or have disclosed the personal information and the purposes for such disclosures. If you interact with Sun Pharma in more than one way, please review each Consumer Type below that applies to you in order to learn about the personal information we collect and how we use and share it in connection with each particular relationship.</p> <p>In addition to the purposes for collecting and sharing personal information described under each Consumer Type below, Sun Pharma collects and discloses any and all personal information (regardless of your relationship or interaction with us) as necessary or appropriate to: comply with laws and regulations; monitor, investigate potential breaches of, and enforce compliance with Sun Pharma policies and procedures and legal and regulatory requirements; comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and exercise or defend the legal rights of Sun Pharma and its employees, affiliates, customers, contractors, and agents.</p>
Disclosure About Direct Marketing	<p>California’s “Shine The Light” law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to other entities for their own direct marketing purposes in the preceding calendar year. Sun Pharma does not distribute your personal information to other entities for their own direct marketing purposes, except as provided for in the Privacy Policy.</p>
Personal Information	<p>In this Supplemental Notice, “personal information” (or “PI”) means any information that identifies, relates to, describes, or is capable of being associated with you or your household, whether directly or indirectly. In the charts below, we use the following categories of personal information to describe the personal information we collect, use, and disclose about consumers:</p> <p>Identifiers Identifiers, such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol (IP) address, phone number, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.</p>

	<p>Network Activity Data</p>	<p>Internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual's interaction with an internet website, application, or advertisement.</p>
	<p>Commercial Information</p>	<p>Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>
	<p>Electronic and Sensory Data</p>	<p>Audio, electronic, visual, thermal, olfactory, or similar information (e.g., a recording of a customer service call or profile photograph).</p>
	<p>Education Information</p>	<p>An individual's education information, including academic information and records.</p>
	<p>Professional Information</p>	<p>An individual's professional or employment-related information.</p>
	<p>Geolocation Data</p>	<p>An individual's precise geolocation data.</p>
	<p>Biometric Information</p>	<p>Biometric information, including an individual's physiological, biological, or behavioral characteristics (including DNA) to the extent it can be used to establish individual identity. Biometric information consists of, but is not limited to, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template (such as a faceprint, a minutiae template, or a voiceprint) can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.</p>
	<p>Inferences</p>	<p>Inferences drawn from any of the other information listed here to create a profile about an individual reflecting the individual's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. (e.g., predications about an individual's preferences or tendencies).</p>
	<p>Other Information in Customer Records</p>	<p>An individual's written signature; health insurance information, including an individual's insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, or any information in the individual's application and claims history; medical information, including any information in possession of or derived from a health care provider, health care service plan, pharmaceutical company, or contractor regarding an individual's medical history, mental or physical condition, or treatment; and financial information, including bank account number, credit or debit card number, or other financial information.</p>
	<p>Protected Characteristics</p>	<p>Characteristics of protected classifications under California or federal law, such as race, gender, physical or mental disability, and religion.</p>
	<p>Sensitive Personal Information</p>	<p>Personal Information that reveals a consumer's social security, driver's license, state identification card, or passport number; account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious beliefs, or union membership; contents of email or text messages; and genetic data.</p>

	Sensitive Personal Information also includes processing of biometric information for the purpose of uniquely identifying a consumer and personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	
Sources of Personal Information	Received From . . .	Example Collection Methods and Circumstances
	You (directly)	<ul style="list-style-type: none"> • Program registration/enrollment forms • Account registration forms • Information request forms • Surveys • When you contact us • Order forms
	Your devices	<ul style="list-style-type: none"> • Automatically collected as you navigate our sites.
	Health care providers	<ul style="list-style-type: none"> • <i>For patients:</i> When you authorize your health care provider to share information with us so that we can provide certain patient support services. • <i>For patients:</i> When your health care provider reports to us information relating to adverse effects you have experienced when using our products. • <i>For health care professionals and caregivers:</i> When a health care provider reports your name and contact information to us for purposes of coordinating patient care.
	Health insurance providers or other payors	<ul style="list-style-type: none"> • <i>For patients:</i> When you authorize your health insurance provider to share information with us so that we can provide certain patient support services. • <i>For health care professionals and caregivers:</i> When a health insurer reports your name and contact information to us for purposes of coordinating patient care.
	Caregivers	<ul style="list-style-type: none"> • <i>For patients:</i> When your caregiver contacts us with questions about your treatment. • <i>For patients:</i> When your caregiver reports to us information relating to adverse effects you have experienced when using our products. • <i>For health care professionals and caregivers:</i> When a caregiver reports your name and contact information to us for purposes of coordinating patient care.
	Event organizers	<ul style="list-style-type: none"> • When you authorize event organizers to share attendee information with us.
	Lead generators	<ul style="list-style-type: none"> • When you authorize a third party to share your personal information with us so that we can provide you with information and services.
	Third parties who verify the information that you provide (e.g., consumer reporting agencies)	<ul style="list-style-type: none"> • <i>For patients:</i> When you apply for patient support services that are income dependent. • <i>For vendors and business partners:</i> In the course of due diligence prior to contracting with you, in order to comply with regulatory requirements.
	Third parties who help us maintain the accuracy and completeness of our records (e.g., data brokers)	<ul style="list-style-type: none"> • On a routine basis to ensure that we have up-to-date contact information and to better serve you.
Third Parties to Whom We Disclose PI	Disclosure to . . .	Example Circumstances for Disclosure
	Service Providers	<ul style="list-style-type: none"> • Third parties who provide benefit verification, program enrollment, and product fulfillment services in connection with our products and services.

	<ul style="list-style-type: none"> • Payment processors, financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention. • Third parties who deliver our communications, such as the postal service and couriers. • Third parties as necessary to complete transactions and provide our products/services, including delivery companies, agents, and manufacturers. • Third parties who provide marketing and data analytics services, such as social media platforms used to deliver our ads, website/email optimization providers, email marketing vendors, and data analytics vendors. • Third party network advertising partners. • Third parties who assist with our information technology and security programs.
Authorized/legal representatives, family members, and caregivers	<ul style="list-style-type: none"> • <i>For patients:</i> To provide you with products and services you have requested. • <i>For patients:</i> To provide product support and assistance.
Health care providers	<ul style="list-style-type: none"> • <i>For patients:</i> To provide product support and assistance concerning your care, when you have authorized such sharing. • <i>For health care professionals and caregivers:</i> When assisting a patient in the coordination of care, use of a product or service, or benefits verification.
Health insurance providers or other payors	<ul style="list-style-type: none"> • <i>For patients:</i> To provide product support and assistance concerning your care, when you have authorized such sharing. • <i>For health care professionals and caregivers:</i> When assisting a patient in the coordination of care, use of a product or service, or benefits verification.
Public authorities	<ul style="list-style-type: none"> • To report adverse events related to a Sun Pharma product or service. • To investigate violations of law. • To otherwise protect our rights or the rights, property, and safety of others. • To otherwise comply with laws and regulations, judicial and administrative orders, or lawful requests from governmental authorities.
Our Uses and Disclosures of Sensitive Personal Information	<p>Under the CCPA, business are permitted to use and disclose sensitive personal information for the purposes below without providing an opt-out. Sun Pharma uses and discloses sensitive personal information only for these purposes:</p> <ul style="list-style-type: none"> • Performing the services or providing the goods reasonably expected by an average consumer who requests those goods or services. • Ensuring security and integrity. • Preventing, detecting, and investigating security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information. • Resisting malicious, deceptive, fraudulent, or illegal actions directed at the business and prosecuting those responsible for those actions. • Ensuring the physical safety of natural persons. • Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to a third party or used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction. • Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions,

	<p>verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services.</p> <ul style="list-style-type: none"> • Undertaking activities to verify or maintain the quality or safety of a product, service, or device that is owned, manufactured by, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business. • Collecting or processing sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.
<p>Your Rights</p>	<p>If you are a California resident, you have the following rights under the CCPA with respect to your personal information:</p> <ul style="list-style-type: none"> • Right to Notice. Before or at the time we collect personal information from you, you have the right to receive notice of the personal information (including sensitive personal information) to be collected, the purposes for which we use it, whether or not that personal information is Sold or Shared, and the length of time we intend to retain each category of personal information. This Supplemental Notice is intended to satisfy this requirement. <ul style="list-style-type: none"> ○ You also have the right to request that we disclose to you the categories of personal information we have collected about you in the preceding 12 months, along with the categories of sources from which the personal information was collected, the purpose for collecting the personal information, and the categories of third parties to whom we disclosed the personal information. • Right of Access. You have the right to request that we disclose or provide you with access to the specific pieces of personal information we have collected about you. • Right to Correction. You have the right to request that we correct inaccurate personal information that we maintain. • Right to Deletion. You have the right to request that we delete the personal information we collect from you. However, in certain situations we are not required to delete your personal information, such as when the information is necessary in order to complete the transaction for which the personal information was collected, to provide a good or service requested by you, to comply with a legal obligation, to engage in research, to secure our websites or other online services, or to otherwise use your personal information internally in a lawful manner that is compatible with the context in which you provided the information. • Right to Opt-Out of the Sale of Personal Information. Sun Pharma does not sell any personal information. • Right to Opt-Out of the Sharing of Personal Information for Cross-Context Behavioral Advertising. Sun Pharma does not share any personal information with third parties for cross-context behavioral advertising. • Right to Limit Uses and Disclosures of Your Sensitive Personal Information. Sun Pharma does not use Sensitive Personal Information for purposes beyond those authorized by the CCPA, as described above. • Right Not to Be Subject to Discrimination. You have the right to be free from discrimination or retaliation for exercising any of your rights under the CCPA as described above. <p>You can exercise your CCPA rights by completing this Privacy Web Form or by calling [888-926-3150] or emailing SunPrivacy@sunpharma.com.</p> <p>VERIFICATION: We value the security and confidentiality of your personal information. Therefore, if you exercise your right to notice, right of access, or right to deletion, we must</p>

	<p>first verify your identify to make sure that you are the person about whom we have collected personal information. We verify every request carefully.</p> <ul style="list-style-type: none"> • When you submit a request, please indicate the specific reason why you are contacting us. • We will assess what personal information we have about you that we can use to verify your request and let you know how to proceed. <p>You may also authorize someone else to submit these requests on your behalf. To do so, you may execute a power of attorney pursuant to California Probate Code sections 4121 to 4130. You may also authorize a third party to submit these requests on your behalf by providing that third party with your signed permission to do so. If you authorize a third party to submit requests on your behalf, we may need to contact you directly to verify your identity.</p>
Contact Us	<p>Call [888-926-3150] or email us at SunPrivacy@sunpharma.com to contact us with questions regarding this Supplemental Notice. California residents who are unable to review or access this Supplemental Notice due to a disability may contact us to request access this Supplemental Notice an alternative format.</p>

Website Visitors

In the past 12 months, we have collected the following categories of personal information of website visitors and have disclosed these categories to third parties for business purposes. We may collect and disclose these categories of personal information in the future as well.

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> • Identifiers • Network Activity Data • Commercial Information • Professional Information • Geolocation Data • Inferences • Other Information in Customer Records • Protected Characteristics • Sensitive Personal Information, including health information 	<ul style="list-style-type: none"> • Directly from you • From your device 	<ul style="list-style-type: none"> • To deliver information, content, products or services that you request. • To provide marketing communications about our products and services, or those of third-parties, that may be of interest to you. • To understand how you use our products, services, and sites in order to improve and further develop our products and services and the content, features, performance, and support available through our sites. • To detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of our sites. • To protect our rights or the rights, property, and safety of others. 	<ul style="list-style-type: none"> • Service providers • Public authorities

Patients

In the past 12 months, we have collected the following categories of personal information of patients and have disclosed these categories to third parties for business purposes. We may collect and disclose these categories of personal information in the future as well.

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> Identifiers Network Activity Data Commercial Information Electronic and Sensory Data Professional Information Geolocation Data Biometric Information Inferences Other Information in Customer Records Protected Characteristics Sensitive Personal Information, including health information 	<ul style="list-style-type: none"> Directly from you From your device Your health care provider Your health insurance provider or other payor Caregivers Event organizers Lead generators Third parties who verify the information that you provide (e.g., consumer reporting agencies) Third parties who help us to maintain the accuracy and completeness of our records (e.g., data brokers) 	<ul style="list-style-type: none"> To deliver information, content, products or services that you request. To provide marketing communications about our products and services, or those of third-parties, that may be of interest to you. To understand how you use our products, services, and sites in order to improve and further develop our products and services and the content, features, performance, and support available through our sites. To provide legal or service-related notices about our products, services, and sites. To detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of our sites. To protect our rights or the rights, property, and safety of others. To comply with laws and regulations, judicial and administrative orders, or lawful requests from governmental authorities. 	<ul style="list-style-type: none"> Service providers Authorized/legal representatives, family members, and caregivers. Your health care provider Your health insurance provider or other payor Public authorities

Health Care Professionals (HCPs) and Caregivers

In the past 12 months, we have collected the following categories of personal information of HCPs and Caregivers and have disclosed these categories to third parties for business purposes. We may collect and disclose these categories of personal information in the future as well.

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> Identifiers Network Activity Data 	<ul style="list-style-type: none"> Directly from you From your device Patient(s) under your care 	<ul style="list-style-type: none"> To deliver information, content, products or services that you request. 	<ul style="list-style-type: none"> Service providers

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> • Commercial Information • Electronic and Sensory Data • Education Information • Professional Information • Geolocation Data • Inferences • Other Information in Customer Records • Protected Characteristics • Sensitive Personal Information, including financial account numbers 	<ul style="list-style-type: none"> • Product distributors • (Other) health care professionals • Health insurance providers or other payors • Event organizers • Lead generators • Third parties who verify the information that you provide (e.g., consumer reporting agencies) • Third parties who help us to maintain the accuracy and completeness of our records (e.g., data brokers) • Publicly available sources (e.g., social media) 	<ul style="list-style-type: none"> • To provide marketing communications about our products and services, or those of third-parties, that may be of interest to you. • To understand how you use our products, services, and sites in order to improve and further develop our products and services and the content, features, performance, and support available through our sites. • To provide legal or service-related notices about our products, services, and sites. • To detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of our sites. • To protect our rights or the rights, property, and safety of others. • To comply with laws and regulations, judicial and administrative orders, or lawful requests from governmental authorities. 	<ul style="list-style-type: none"> • (Other) health care professionals • Health insurance providers or other payors • Public authorities

Other Business-to-Business (B2B) Contacts

In the past 12 months, we have collected the following categories of personal information of B2B Contacts and have disclosed these categories to third parties for business purposes. We may collect and disclose these categories of personal information in the future as well.

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> • Identifiers • Network Activity Data • Commercial Information • Electronic and Sensory Data • Education Information • Professional Information • Geolocation Data • Inferences • Other Information in Customer Records 	<ul style="list-style-type: none"> • Directly from you • From your device • From your employer • Third parties who help us to maintain the accuracy and completeness of our records (e.g., data brokers) • Publicly available sources (e.g., social media) 	<ul style="list-style-type: none"> • To deliver information, content, products or services that you request. • To provide marketing communications about our products and services, or those of third-parties, that may be of interest to you. • To understand how you use our products, services, and sites in order to improve and further develop our products and services and the content, features, performance, and support available through our sites. 	<ul style="list-style-type: none"> • Service providers • Public authorities

Categories of PI Collected and Disclosed	Sources of PI	Purposes for Collecting or Disclosing PI	Third Parties to Whom We Disclose PI
<ul style="list-style-type: none"> • Protected Characteristics • Sensitive Personal Information, including financial account numbers 		<ul style="list-style-type: none"> • To provide legal or service-related notices about our products, services, and sites. • To detect, prevent, and respond to fraud, intellectual property infringement, violations of our Terms of Use, violations of law, or other misuse of our sites. • To protect our rights or the rights, property, and safety of others. • To comply with laws and regulations, judicial and administrative orders, or lawful requests from governmental authorities. 	