**Privacy Policy**

**EFFECTIVE DATE: JANUARY 1, 2021**

This privacy policy (the “Privacy Policy”) describes how Sun Pharmaceutical Industries, Inc. (“Sun Pharma,” “we,” or “us”) collects, uses, maintains, and shares Personal Information, including Personal Information gathered through this website and other Sun Pharma digital platforms (the “Sites”), Sun Pharma studies, products, and services (collectively with the Sites, the “Services”). “Personal Information” means information that identifies or relates to an identifiable person.

This Privacy Policy is incorporated into, and is subject to, the Terms of Use. By visiting the Sites or using the Services, you accept and consent to the collection, use, and disclosure of the Personal Information described in the Privacy Policy and Terms of Use.

If you are unable to review or access this Privacy Policy due to a disability, you may contact us to request access to this Privacy Policy in an alternative format. Please call 888-926-3150 or email SunPrivacy@sunpharma.com.

**WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?**

We collect Personal Information regarding our customers (e.g., patients and health care professionals), prospective customers, vendors and business partners, Site visitors, employees, and job applicants. The types of Personal Information we may collect depend on the nature of our relationship with you and the requirements of applicable law. We endeavor to collect only information that is relevant for the purposes of processing. The table below sets out the different categories of Personal Information that we may collect.

|  |  |  |
| --- | --- | --- |
| Category of Personal Information | Example Data Elements | Category of Individuals About Whom Processed |
| Contact Information | * Name
* Postal address
* Telephone number
* Email address
 | * Existing and prospective customers
* Vendors and business partners
* Employees
* Job applicants
 |
| Unique IDs | * Customer number
* Account number
* Username
* Device identifier
* Cookie ID
* Advertising ID
* Government-issued ID number
* Medical license number
 | * Existing and prospective customers
* Vendors and business partners
* Employees
* Job applicants
* Site visitors
 |
| Professional Information | * Employer and job title
* Employment history
* References
* Practice and specialty
* Professional credentials
* Education
 | * Existing and prospective customers (health care professionals)
* Vendors and business partners
* Employees
* Job applicants
 |
| Health Information | * Information about physical or mental health, medical history, and medical treatment or diagnosis
* Name of patient’s health care provider
* Health insurance information
 | * Existing and prospective customers (patients)
* Vendors and business partners
* Employees
* Job applicants
 |
| Financial Information | * Bank account number and details
* Payment card information
* Payment and reimbursement amounts
 | * Existing and prospective customers
* Vendors and business partners
* Employees
* Job applicants
 |
| Transaction/Interaction Information | * Program registrations and subscriptions
* Purchase history
* Products and services considered
* Prior communications
 | * Existing and prospective customers
* Vendors and business partners
 |
| Demographic Information and Interests | * Age
* Marital and family status
* Household demographic data
* Site preferences
* Languages spoken
* Hobbies
 | * Existing and prospective customers
* Employees
* Job applicants
 |
| Site Activity Information | * Browsing and search history
* Referring web site addresses
* App usage data
* Device characteristics
 | * Existing and prospective customers
* Vendors and business partners
* Site Visitors
 |

**HOW DO WE USE PERSONAL INFORMATION?**

We may use your Personal Information for a variety of purposes. These may include:

* To respond to your contact inquiries.
* To provide you with Services you have requested and/or customer support.
* To communicate with you about Services that may be of interest to you.
* To develop and improve our Services.
* To analyze how visitors to our Sites and users of our Services use the Sites and Services, so as to make them more interesting and useful to you, to improve the value of the material available on the Sites, to increase the effectiveness of the Services we offer, and to help our partners and service providers, or our Site design teams, create, serve, and track promotions our customers might like.
* To enforce our Terms of Use, prevent or respond to fraud, and fulfill legal obligations, such as responding to court orders, subpoenas, or government requests.
* *For current and prospective vendors and business partners:* To conduct due diligence prior to entering into a contract with you.
* *For health care professionals:* To report information concerning our relationships with health care professionals, in accordance with legal requirements and industry standards.
* *For job applicants:* To process your application for employment, including administration of the recruitment process and evaluation of your candidacy.

By using the Sites or Services, or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and any administrative issues. If we learn of a security system’s breach, we may attempt to notify you electronically by posting a notice on the Sites or sending an email to you. You may have a legal right to receive this notice in writing. If you have any questions or concerns, please notify us at **SunPrivacy@sunpharma.com**.

We may combine or aggregate any Personal Information we collect for any of the above purposes.  We may also anonymize your Personal Information in such a way that you may not reasonably be re-identified by us or any other organization and may use such anonymized information for any lawful purpose.

**HOW DO WE SHARE INFORMATION?**

We share your Personal Information for the purposes described in this Privacy Policy, including:

* We may share your Personal Information with other corporate affiliates of Sun Pharma for the functions and activities described above in relation to the purposes for which we collect your Personal Information.
* We may disclose your Personal Information to our service providers and other third parties who process your information to provide services to us or you, including, without limitation, market research; fraud protection; data analysis; email management; and customer service. These service providers and third parties are contractually obligated to maintain the confidentiality of your Personal Information and to use it only for purposes of carrying out the business of Sun Pharma. These service providers and other third parties can be classified in the following categories:
	+ Distributors, which we use to deliver our products;
	+ Marketing partners, which we use to send you promotional communications;
	+ IT service providers, such as our data hosting provider and companies we employ to manage our Sites and to provide Site-related services and/or to assist us in analyzing how our Sites are used; and
	+ Other service providers that we may engage to provide services to us or on our behalf.
* We may disclose your Personal Information to any law enforcement agency, court, regulator, government authority, or other third party where we believe this is necessary to comply with a legal or regulatory obligation, in order to enforce our Terms of Use, or otherwise to protect our rights/property or the rights/property of any third party.
* We may disclose your Personal Information while negotiating or in relation to a change of corporate control, such as a restructuring or sale of assets.
* We may share Personal Information with third parties, including, but not limited to, advisors, advertisers, analytics providers, and investors, for the purpose of conducting our business.

We reserve the right to disclose to third parties anonymized information for any lawful purpose.

**SECURITY**

Sun Pharma cares about the security and confidentiality of your Personal Information. We seek to maintain commercially reasonable administrative, technical, and physical security, collection, storage, and processing measures to protect against the unauthorized access, alteration, disclosure, or destruction of the Personal Information you submit to us. However, no website is completely secure, error-free, or “hacker proof.” You are responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse. We cannot guarantee that your use of our Sites or Services will be completely safe, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure. We are not responsible for third-party circumvention of any privacy settings or security measures.

**CHILDREN**

We do not knowingly collect or store Personal Information from anyone under the age of 13 unless or except as permitted by law. ANY PERSON WHO VISITS ANY OF THE SITES OR USES THE SERVICES REPRESENTS TO US THAT HE OR SHE IS 13 YEARS OF AGE OR OLDER. If we are made aware that we have received Personal Information from someone under 13, we will use reasonable efforts to remove that information from our records.

**COOKIES AND SIMILAR TECHNOLOGIES**

Sun Pharma uses cookies and similar technologies to collect information for the purposes outlined in this Privacy Policy. A cookie is a small data file that our server sends to your browser when you visit the Sites. The use of cookies helps us to provide certain functionality on the Sites. You may be able to set your Internet browser to disable, turn the cookie feature off, or reject cookies entirely by changing the settings. Changing these settings, however, may affect your ability to use certain features and functions of the Sites. Please note that by visiting or using the Sites you are consenting to the use of cookies. For more information about third-party cookies, including information about how to opt out of these technologies, [**click here**](https://optout.networkadvertising.org/?c=1#!%2F).

The Sites may also use other technologies, including, but not limited to, JavaScript tags or tracking pixels to collect, process, and store browsing information as described above. Tracking pixels and tags assist in delivering cookies and allow us to collect browsing information about you. Tracking pixels or tags may also be included in the emails we send you in order to determine whether the emails have been opened and if you have clicked on links within the email.

The Sites may use first-party cookies (set by Sun Pharma) and third-party cookies (set by web analytics partners). The cookies used on our Sites may be persistent or session based. A session cookie is a piece of information that is enabled only during a particular website session. Session cookie files are deleted after logging off the Internet browser or powering off your computer. In contrast, a persistent cookie is not deleted after logging off an Internet browser or powering off your computer but “persists” between sessions. Both types of cookies provide statistical information as well as help make improvements in navigation of the Sites.

As noted, Sun Pharma may use third-party analytics tools, including Google Analytics, to help us measure traffic and usage trends on our Sites. These tools utilize cookies and other technologies to collect information sent by your devices to our Sites, including:

* Your browser name;
* Demographic data about you;
* The pages you visit on the Sites;
* Your existing applications;
* Whether you have previously accessed the Sites;
* The IP (Internet Protocol) address for your computer;
* Your mobile network information;
* Navigational data, also known as log files, server logs, or clickstream data; and
* Anonymous IDs for advertising.

Note that these third-party service providers have their own privacy policies addressing how they use such information. To opt out of Google Analytics on the Sites, go to [**https://tools.google.com/dlpage/gaoptout**](https://tools.google.com/dlpage/gaoptout).

At this time, we do not respond to browser Do Not Track signals.

**PRIVACY RIGHTS**

**Nevada Privacy Rights**

We do not sell Personal Information for monetary consideration. Nevada residents have the right to submit a verified request directing us not to sell their Personal Information. If you are a Nevada resident, and would like to submit such a request, please send your request to **SunPrivacy@sunpharma.com**.

**California Privacy Rights**

If you are a California resident, you can learn more about Personal Information we collect from or about you through both your online and offline interactions with our Sites and Services in the *Supplemental Notice for California Consumers* section by clicking [insert link].

**UPDATING YOUR INFORMATION**

To keep your Personal Information current and accurate, please contact us as specified above. If you decide to email us, please include the words “Updating Personal Information” in the subject line.

We will take reasonable steps to update or correct Personal Information in our possession that you have previously submitted via the Sites or Services.

**DATA RETENTION**

Except to the extent prohibited by law, and subject to this Privacy Policy, we will retain your information for as long as needed to provide you with the Services, for Sun Pharma’s valid business purposes, and as necessary to comply with our legal obligations, resolve disputes, defend our legal rights, and enforce our agreements.

Where we process Personal Information for marketing purposes with your consent, we will continue to process the data until you notify us that you wish to unsubscribe to future contact. Where you do notify us that you wish to unsubscribe to further contact, we will keep a record of the fact that you have asked us not to send you direct marketing communications so that we can respect your request in the future.

Where we process Personal Information to meet legal requirements, we will hold this for as long as the law requires (for example, we may hold records to help prevent fraud and other prohibited or illegal activities).

**NEW USES OF PERSONAL INFORMATION**

From time to time, we may desire to use Personal Information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

**PRIVACY POLICY CHANGES**

We may, in our sole discretion, change this Privacy Policy from time to time. Any and all changes to this Privacy Policy will be reflected here and the date new versions are posted will be stated at the top of this Privacy Policy. If we make material changes in how we use Personal Information, we will notify you by email if you have provided your email address to us or by means of a notice on the Sites.

**LINKS TO THIRD-PARTY WEBSITES**

Our Sites may contain links to other third-party websites. This Privacy Policy does not apply to the practices of other websites, and Sun Pharma is not responsible for the actions and privacy policies of third parties. We encourage you to be aware of when you leave our Sites and to read the privacy policies of each website that you visit.

**HOW DOES THIS POLICY APPLY OUTSIDE OF THE U.S.?**

The information collected by Sun Pharma is hosted in the United States of America and is subject to U.S. state and federal law. If you are accessing the Sites from other jurisdictions, please be advised that you are transferring your Personal Information to us in the United States where data protection and privacy laws may be less stringent than the laws of your country. BY USING OUR SITES, YOU CONSENT TO THE TRANSFER AND USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

**CONTACT US**

If you have any questions or comments regarding our Privacy Policy, please contact us 888-926-3150 or email SunPrivacy@sunpharma.com.