

## **ALEMBIC PRIVACY POLICY**

This Privacy Policy sets out how Alembic Pharmaceuticals Australia Pty. Ltd. ABN 86 161 533 133 (hereinafter referred to as "Alembic") manage and treat Personal Information in the course of its business activities in the territory of Australia.

The activities of the Alembic includes but not limited to licensing of dossier & development, registration and commercialization of pharmaceutical products.

### **Definitions**

**Personal Information** generally means information or opinions about an individual who is reasonably identifiable from that information. Personal Information includes Health Information and Sensitive Information.

**Health Information** includes information or opinions about the health of a person or health services provided to them.

**Sensitive Information** includes information or opinions about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, as well as Health Information, genetic information and biometric information.

The aforesaid terms are more fully defined in the Privacy Act, 1988 ("Privacy Act").

### **What types of Personal Information does the Alembic collect, how is it collected and for what purpose is it used?**

#### **Health professionals**

Where you are a health professional (such as a doctor or pharmacist) your contact details are collected when you provide us with queries or feedback in relation to products or pharmacovigilance information (i.e the monitoring of medicines and other therapeutic goods). This type of Personal Information is generally collected directly from you when you contact us. Your contact information is used for follow-up activities, including those that are part of standard pharmacovigilance activities. The failure to provide us with such Personal Information or to consent to the disclosure of this information to our suppliers and distributors (see below) may result in the failure to properly investigate and follow-up on such reports.

We will also collect your contact details if you are a doctor and your details have been provided to us via a third party including patients with your consent or as permitted under law. Once contact has been made with you, further records are kept of the communications and meetings

with you. This information is used to monitor our contact with you, including information we provide to you regarding our products and to obtain further information on adverse events reported by you. Failure to maintain such records may potentially result in repetitive and inefficient contact with you.

If you are a health professional and provide the Alembic with Personal Information of your patients, Alembic expects that you obtain the consent of your patient before disclosing their Personal Information to us. The details of your patient may be de-identified where we are not satisfied that you have obtained that consent.

### **Patients**

If you are a patient, your Personal Information is collected when pharmacovigilance reports or product complaints are reported to the Alembic directly by you or through your representatives/health professional. This Personal Information is generally collected on behalf of the Alembic through its Pharmacovigilance service provider. The specific types of Personal Information collected include your name, contact details, medical status and background, any medications taken, any treatment received.

Personal Information of patients is collected for the purpose of investigating and following up product complaints and pharmacovigilance reports, or providing you with professional services (as the case may be). Failure to provide us with all the information sought may result in our inability to provide those services or investigate the pharmacovigilance report or product complaint.

### **Business associates and contractors**

The Alembic collects your Personal Information if you own, or work for, a business associate, customer or contractor of an Alembic. This information generally consists of contact information and is generally collected directly from you or from your employer. Your Personal information is used for the purposes of facilitating the business relationship (including as contemplated under any contract). Failure to collect such information may hamper our ability to communicate with you.

### **Potential Employees**

The Alembic also collects Personal Information from individuals who are shortlisted as applicants for a position within a member of the Alembic. Where you have applied for a position as employee, your name, contact details, curriculum vitae, professional experience and other

associated information are collected either through a service provider or directly from you. This Personal Information is used for assessing your application for employment. In some cases, this information is retained for consideration for any future employment positions.

**Disclosure of your Personal Information (including overseas disclosure)**

Where you are a health professional or patient (to the extent your Personal Information has not been de-identified) and your details have been collected for pharmacovigilance or product complaint purposes, your Personal Information is disclosed to our third party pharmacovigilance service provider as well as to our affiliates, suppliers and distributors to facilitate compliance and follow up Pharmacovigilance activities required under regulatory requirements and to investigate product complaints. In some circumstances these affiliates, suppliers and distributors are located overseas, namely in Switzerland and India.

We may also disclose your Personal Information by consent or require in other circumstances permitted by the Privacy Act.

**Alembic websites**

When you visit our websites or use other online resources or apps provided by any member of the Alembic, we may collect information about your computer or electronic device (eg your Internet Protocol (IP) address, browser type, and date and time of your request) by using automatic systems of browsing data collection, such as cookies. A cookie is a file stored on your hard drive; it does not contain intelligible information, but it allows linking between a terminal and information about your preferences. These tracking technologies are used to provide additional functionality to your use of our resources; for example, to identify you as a healthcare professional, or to remember your preferences and selections. You may limit or remove cookies from your computer or device, but, in these situations, our ability to provide optimal service may be limited. By using any website of the Alembic, you consent to the use and installation of these cookies and web beacons to provide you with these services.

By using websites, online resources, apps, or any other service of a member of the Alembic, you also consent to the storage and handling of any Personal Information collected in accordance with this Privacy Policy or any update to it.

**Storage and Security of Personal Information**

The Alembic will take commercially reasonable steps to keep secure all Personal Information from misuse, interference, loss and unauthorized access. However, we cannot guarantee that third parties will never be able to defeat our security measures or use your Personal Information

for improper purposes; for example, we do not control or monitor web sites to which we may provide a link. Our Privacy Policy does not apply to third party web sites.

Personal Information is stored on secure servers that are protected in controlled facilities, or in hardcopy paper records stored in secure access facilities. The Alembic requires its employees and data processors to protect the confidentiality of any Personal Information held by us.

### **Accessing your Personal Information**

If at any time you want to update or know what Personal Information the Alembic holds, you are welcome to access your record by contacting the Alembic using the details set out below. Your information will generally be made available to you within reasonable time of receiving your request.

If you make such a request, you will be asked for identification so that we can verify your identity before providing you with your Personal Information. If you require Personal Information to be presented in an alternative format, we will make commercial reasonable efforts to accommodate you. If there is an associated charge to us in order to retrieve your Personal Information, we will advise you of the charges that you would be responsible for and obtain your authorization before proceeding.

We may not be able to give you access to Personal Information where such access would result in disclosure of other individuals' Personal Information, would result in a breach of a contract, or would result in disclosure of trade secrets or other proprietary business information belonging to Alembic or a third party.

The Alembic reserves the right to not provide access to individuals if the request for access is frivolous or vexatious, or falls into another relevant exception category, and we may impose reasonable charges for such access.

### **Amending or deleting your Personal Information**

The Alembic will take reasonable steps to ensure Personal Information (including Credit Information) is accurate, up-to-date and complete and notify you of any such changes. If you wish to update your Personal Information, please contact us to amend your record accordingly. Please note we cannot alter medical information generated as part of a clinical trial or study.

If you wish to have your Personal Information deleted, please contact us and we will take all reasonable steps to delete it. In circumstances where we are required to retain Personal Information, we may not be able to delete your Personal Information. Such circumstances may include, for example, where we are required to retain Personal Information by law or regulation,

to continue to manage certain programs, to conduct clinical trials, to defend legal claims, or for certain necessary business purposes.

**Contact us**

Please contact us if you have a complaint regarding the Alembic's compliance with this policy or any applicable privacy laws. The Alembic will consider and respond to a complaint within a reasonable time frame. In addition, please contact us if you wish to discuss any privacy issues, have any concerns regarding your Personal Information or do not wish to receive any future communications from any member of the Alembic. You can contact the Alembic through the following means:

By post:

Alembic Pharmaceuticals Australia Pty. Ltd.,

Registered Office Address:

Freshwater Place' Level 13,

2 Southbank Boulevard,

Southbank VIC 3006

By Email: [info@alembicaustralia.com](mailto:info@alembicaustralia.com)

The Alembic's commitment to being a leading provider of pharmaceuticals means its business will continue to evolve as new services and products are introduced. Because of this, from time to time, its policies may be reviewed and revised, and we reserve the right to amend or replace its Privacy Policy at any time. The Alembic will notify you of any such changes by posting an updated version of the Privacy Policy on its website.

**Should there be a discrepancy between this Privacy Policy and the applicable laws including Privacy Act at any time, the applicable laws at that time will prevail.**

**Owner of the Policy**

The Director

Alembic Pharmaceuticals Australia Pty. Ltd.