

Privacy Policy

§ 1 Controller and Scope

This Policy applies to the Glenmark entities detailed in § 14 below (“Glenmark”, “we” or “us”). The subject of data protection is a matter of particular concern for us, and we would therefore like to familiarise you with how we collect, use and pass on personal data. In this privacy policy, we will explain how we handle personal data that we or our service providers process by using our website or similar environments, such as mobile websites or apps, that are operated and maintained by us and from which you can access this privacy policy (jointly called the “website” in the following).

§ 2 Data Protection Officer

We appointed Dr. Karsten Kinast Attorney at Law as a Data Protection Officer. If you have any questions regarding this Policy, please contact our Data Protection Officer at dpo.glenmark@glenmarkpharma.com

§ 3 Principles and Purposes of Processing Personal Data

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour.

We use personal data about you for the following purposes:

- to answer your enquiries and meet your requests, for instance to send you requested information
- to send you important information about our business relationship with you, about our terms of business or use and/or to send you other information related to processing and
- to promote our business interests, for example for data analysis, for checks, for the development of new products and services, to improve our website, to personalize your use of our website, by presenting you with products and offers tailored to you, as well as to identify the effectiveness of our advertising campaigns. In this respect, we adhere strictly to legal stipulations and as far as possible only use anonymised data, which does not allow inferences to be made about you as an individual. The law may provide separate preconditions for the individual uses of data.
- in this case, we will request your consent.

- to operate use-based online information; more information on this can be found under cookie information.

§ 4 Data Processing

1. Website

a. Scope and Purpose of the Processing

In some sections of the website you may be asked to provide personal details in order to use the described functions (such as registering for a newsletter, tips/information, editing orders and reviews of our products and services) or in order to be able to take part in particular promotions (such as competitions or other advertising promotions). In doing so, you will be informed which personal data must absolutely be provided for these services and which you can provide voluntarily.

This website gathers the following data in particular for contact or order forms:

- name,
- e-mail address,
- delivery address

We would like to point out to you that the personal data that you provide may be combined with other information gathered about you online or offline, if this is necessary to meet contractual aims and is legally permitted. We will inform you of this.

b. Legal Basis

The processing takes place on the legal basis of Art. 6 para. 1 lit. a, b, c and f GDPR. In case the processing takes place on the legal basis of Art. 6 para. 1 lit. a GDPR, therefore the following freely given consent have must been given:

- I agree that my data will be stored when registering for the user account in order for me to log in on future visits with username and password without having to enter my data again. I have read and accepted the current privacy policy. I can revoke this consent any time with effect for the future by deleting my user account in the member area within the account settings by deleting the account or by contacting Glenmark at dpo.glenmark@glenmarkpharma.com.

2. Data Deletion and Storage Period

The storage duration of the personal data ends as soon as the data is no longer necessary for purpose of the processing. The personal data will then be erased.

3. Personal registration to access information restricted to professional groups

a. Scope and Purpose of the Data Processing

While some of the web pages and functions provided by Glenmark can be visited and used without personal registration, some pages are only open to specific groups of people and therefore require registration. According to the regulations of the Advertising of Medicinal Products, Glenmark may only make certain information about prescription-only medications or medical content accessible if you belong to so-called professional groups in the sense of these regulations (such as doctors and pharmacists). Please be aware that the information we offer you on our website through our services that require registration is of a general type and cannot provide any advice for the treatment of patients in individual cases.

Against this background, as a members of the relevant professional groups, you can be offered with the opportunity to register for the closed section of our website in order to be able to retrieve the information about our medications described above. Access to these closed sections can take place either through direct registration with Glenmark or through external service providers.

b. Legal Basis

The processing takes place on the legal basis of Art. 6 para. 1 lit. a, b, c and f GDPR. In case the processing takes place on the legal basis of Art. 6 para. 1 lit. a GDPR, therefore the following freely given consent have must been given:

- I agree that my data will be stored when registering for the user account in order for me to log in on future visits with username and password without having to enter my data again. I have read and accepted the current privacy policy. I can revoke this consent any time with effect for the future by deleting my user account in the member area within the account settings by deleting the account or by contacting Glenmark at dpo.glenmark@glenmarkpharma.com.

c. Data Deletion and Storage Period

The storage duration of the personal data ends as soon as the data is no longer necessary for purpose of the processing. The personal data will then be erased

§ 5 Cookies

1. Scope and Purpose of the Processing

Cookies: We use so-called cookies in some areas of our website, e.g. to recognize the preferences of visitors and to be able to design the website accordingly. This facilitates navigation and a high degree of user-friendliness of a website. Cookies also help us to identify particularly popular areas of our website. Cookies are small files that are stored on a visitor's hard drive. They allow information to be stored for a certain period of time and to identify the visitor's computer. For better user guidance and individual service presentation, we use permanent cookies. We also use so-called session cookies, which are automatically deleted when you close your browser. You can set your browser so that it informs you about the placement of cookies. This makes the use of cookies transparent for you. Important: If you

completely exclude the use of cookies, you may not be able to use certain functions of our website. We use the following four categories of cookies on our website:

- Necessary Cookies
- Performance Cookies
- Functionality / personalization Cookies
- Targeting Cookies. Various types of cookies are used on our website, the type and function are explained as follows:

2. Categories of Cookies

Absolutely necessary cookies: These cookies are necessary so that you can move around the website and use its functions, for example when accessing password-protected areas. Without these cookies, we cannot provide you with certain services you have requested. We use cookies to uniquely identify registered users so that they can be identified during their stay and when they return to the website.

Performance cookies: These cookies collect information about how visitors use a website, for example, which pages they visit most frequently and whether they receive error messages from websites. These cookies do not collect any data that can be used to identify visitors. All information collected with the help of these cookies is anonymous and serves exclusively to improve the functionality and service of the website. We therefore use performance cookies to generate statistics on how our website is used and to see how effective our advertising campaigns are.

Functionality/ personalisation cookies: These cookies allow websites to remember a visitor's previous information (e.g. user name, language or selected market) in order to offer optimised features tailored to the visitor. For example, a website can provide you with up-to-date information about your market by storing your current location in a cookie. These cookies also serve to maintain the settings you make on the website (e.g. font or font size and other user-adjustable options). They are also used to provide services you have requested, for example when you want to watch a video. These cookies are not able to track your browser activity on other websites. They do not collect any information about you that can be used for advertising purposes and cannot trace where you were on the Internet outside our website. We therefore use functionality/ personalisation cookies to recognise you the next time you visit our website and to personalise content and save your settings (for example, your preferred market).

Targeting Cookies: These cookies are used to tailor advertising even more specifically to you and your interests. They also serve to limit how often you see an ad, measure the effectiveness of an ad campaign and understand people's behaviour after viewing an ad. Targeting cookies are usually placed on the pages of advertising networks with the consent of the website operator. You recognise that the user has visited a website and pass this information on to other companies, e.g. advertising companies. They are often linked to a website functionality provided by this company. We therefore use targeting cookies to link to social networks that may then use the information about your visit to tailor advertising on other websites to you and to provide the advertising networks we use with information about your visit so that, based on your browsing behaviour, you can later be presented with exactly the advertising that you are potentially interested in.

3. Legal Basis

Due to the described purposes of use, the legal basis for the processing of personal data using cookies lies in Art. 6 para. 1 lit. f GDPR. If you have given us your consent to the use of cookies on the basis of a reference ("cookie banner") given by us on the website, the lawfulness of the use is additionally governed by Art. 6 para. 1 s. 1 a GDPR.

4. Storage Time

As soon as the data transmitted by the cookies is no longer necessary for the purposes described above, this information will be deleted. Further storage may take place in individual cases if this is required by law.

5. Browser Settings

Most browsers are already set to accept cookies by default. However, you can change your browser settings so that it only accepts certain cookies or no cookies at all. However, we would like to point out that you may no longer be able to use all the functions of our website if cookies are disabled by your browser settings on our website.

You can also use your browser settings to delete cookies already stored in your browser. Furthermore, it is possible to set your browser so that it informs you before cookies are stored. Since the different browsers may differ in their respective functions, we ask you to use the respective help menu of your browser for the setting options.

If you would like a comprehensive overview of all third-party access to your Internet browser, we recommend that you install specially developed plug-ins.

More information on the subject of cookies can be found at: <http://www.allaboutcookies.org/>

This cookie information also contains information on how cookies can be deactivated if you do not agree to their use. By using our website, you agree that we can use cookies as described above.

§ 6 Passive processing (e.g. Tracking Tools)

If you use this website, specific personal data can be processed in a passive way using various technologies, i.e. without you expressly entering it. Such passive information gathering primarily takes place in the following cases and for the following data:

Information from your browser: Specific information is typically processed by browsers and passed on automatically, such as your MAC address (unique device designation), the screen resolution, your operating system (Windows, Apple, Android), the version of your operating system, as well as the type and version of your internet browser.

Your IP address: Your IP address is a combination of figures issued automatically to the computer used by you by your internet provider. An IP address is automatically processed in the log files of our web server when a user calls up our website. Communication between the web server and the visitor's computer is not possible without the IP address. If we log and store the visiting time on our websites under the IP address, the IP address is anonymised to rule out any reference to you by us.

Device information: We would like to point out that under certain circumstances and in the case of mobile terminals we process the unique device number (IMEI) – like the MAC address for computers. However, such processing only occurs when it is required to provide the respective requested service.

Website analysis: Technologies for website analysis are used on our website. Using this technology, data is saved and processed for marketing and optimisation purposes. The personal data required for this is also processed using cookies. In this regard, please be aware of our cookie information.

This website uses Google Analytics, a web-analysis service of Google Inc. ("Google"). Google Analytics uses so-called "cookies", text files saved on your computer that facilitate analysis of your use of the website. The personal data generated by the cookie on your use of this website is generally transferred to a Google server in the USA and saved there. In the case of activated IP anonymisation on this website, your IP address will, however, be abbreviated in advance by Google within Member States of the European Union or in other signatory countries to the Treaty on the European Economic Area (using the extension "_anonymizeIp()"). Only in exceptional cases will the full IP address be sent to a Google server in the USA and abbreviated there. On the orders of the operator of this website, Google will use this personal data to analyse your use of the website, to compile reports on website activities, and to provide further services for the website operator associated with website use and internet use. The IP address passed on by your browser within the scope of Google Analytics will not be merged with other Google data. You can prevent the saving of cookies through a relevant setting in your browser software; however, we would like to point out that in this case, you may not be able to make full use of all the functions of this website. You can countermand the collection and storage of data by Google Analytics at any time with future effect. You can prevent the processing of data generated by the cookie and related to your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plug-in (deactivation add-on) from tools.google.com/dlpage/gaoptout.

§ 7 Plug-Ins

Some content on the website may require certain software and/or plug-ins to be viewable. Plug-ins are software that works with your browser to provide capability the browser may not otherwise have.

§ 8 Use of service providers for the processing of personal data

If necessary and legally allowed we pass personal data obtained using our website to the following third parties:

- Any companies that form part of the Glenmark concern, but only for the purposes identified in this privacy policy and within the scope of permitted transfers. An overview of the businesses in our concern (called Glenmark concern companies in the following) is available here: www.glenmarkpharma.com. However, we remain fully responsible for the handling of personal data for shared use.
- Our business partners, with whom we offer advertising using shared brands and joint marketing. A precondition for this is that the law or your consent permits such a

transfer. Also, the business partners are contractually obliged to only use the personal data according to our specifications before the personal data is transferred.

- Service providers who provide services such as website hosting and moderation, the processing of your reviews of products and services, the hosting of mobile applications, data analysis, payment handling, order handling, infrastructure provision, IT services, customer services, delivery services for e-mails and direct advertising, credit-card settlements and audits, in order to carry out these services. Here, too, the contractual partners are accordingly bound by our contract to the stipulations under data-protection law.
- Third parties in the case of reorganisations, mergers, sales, joint ventures, transfers or other disposals regarding our entire company or our entire assets or shares and/or parts thereof (for example, in association with insolvency or similar proceedings), if legally allowed.

Apart from that, we will only pass on your personal data to third parties if:

- you have given your express consent pursuant to Art. 6 (1) sentence 1 lit. a GDPR,
- it is legally permissible and necessary for the fulfilment of a contractual relationship with you pursuant to Art. 6 (1) sentence 1 lit. b GDPR,
- there is a legal obligation to pass on the data in accordance with Art. 6 (1) sentence 1 lit. c GDPR,
- the disclosure pursuant to Art. 6 (1) sentence 1 lit. f GDPR is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data.

§ 9 Hyperlinks

This privacy policy does not affect any third-party websites, even if there is a reference or link to these third-party websites. We do not endorse the content of such third-party websites. The same applies accordingly for graphic elements such as banners or shortcuts that when clicked on take you to another website. For these third-party websites, please go to the websites of the respective provider to find out how they handle your data.

§ 10 Your Rights as a Data Subject

If your personal data are processed, you are a data subject within the meaning of the General Data Protection Regulation (GDPR) and the following rights apply to you:

- Pursuant to Art. 15 GDPR you can request information about your personal data processed by us.

In particular, you may obtain information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the right to lodge a complaint with a supervisory authority, the origin of your data, if not collected from us, about transfer to third countries or international organizations, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about the logic involved.

- Pursuant to Art. 16 GDPR you can immediately demand the correction of incorrect data or the completion of your personal data stored with us.
- Pursuant to Art. 17 GDPR, you may request the deletion of your personal data stored by us, provided that the processing not be necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- In accordance with Art. 18 GDPR, you have the right to obtain from the controller restriction of processing if you dispute the accuracy of the personal data is contested, the processing is unlawful, we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims. You also have the right according to Art. 18 GDPR if you have filed an objection against the processing in accordance with Art. 21 GDPR.
- Pursuant to Art. 20 GDPR, you have the right to receive the personal data provided by you to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.
- Pursuant to Art. 7 para. 3 GDPR you can withdraw your consent at any time. As a consequence, we are no longer allowed to continue the data processing based on this consent for the future.
- Pursuant to Art. 77 GDPR, you have the right to lodge a complaint with a supervisory authority. Usually, you can contact the supervisory authority of your habitual residence, your place of work or our company headquarters.

You can exercise these rights by contacting Glenmark at dpo.glenmark@glenmarkpharma.com

§ 11 Right to object

When processing of your personal data is based on legitimate interests pursuant to Art. 6 para. 1 sentence 1 lit. f GDPR, you have – as already mentioned above – the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are reasons arising from your particular situation.

Please send your objection to Glenmark at dpo.glenmark@glenmarkpharma.com

§ 12 Cross-border transfer

Your data can be saved and processed in any country in which we maintain branches or employ service providers. A precondition for the transfer is that the permissibility of both the transfer and receipt is guaranteed by the legal requirements in the country of the third-party transfer. To this end, the Glenmark concern companies have adjusted their data-protection standards to the European level of data protection. In addition, standard contractual clauses of the European Commission are used. In this way, we have taken precautions so that there is a level of data protection that corresponds to EU law when the recipient receives your data.

For more information please contact Glenmark at dpo.glenmark@glenmarkpharma.com

§ 13 Data Security and Security Measures

We commit ourselves to protecting your privacy and to treat your personal data confidentially. In order to prevent manipulation, loss or misuse of your data stored with us, we take extensive technical and organisational measures, which are regularly checked and adapted to technological progress.

However, we would like to point out that due to the structure of the internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions for which we are not responsible.

In particular, unencrypted data - e.g. if this is done by e-mail - can be read by third parties. We have no technical influence on this. It is the responsibility of the user to protect the data provided by him against misuse by encryption or in any other way.

§ 14 Glenmark Entities

No.	Entity name	Registered address
1	Glenmark Pharmaceuticals S.R.O.	City Tower, Hvezdova 1716/2b, 140 78 Praha 4, Czech Republic
2	Glenmark Pharmaceuticals Distribution S.R.O.	City Tower, Hvezdova 1716/2b, 140 78 Praha 4, Czech Republic
3	Glenmark Pharmaceuticals SK S.R.O.	Tomasikova 64, 83101, Bratislava, Slovak Republic
4	Glenmark Pharmaceuticals Sp. z.o.o.	ul. Osmańska 14, 02-823 Warszawa, Poland
5	Glenmark Pharmaceuticals S.R.L.	18 Elefterie Street, 5th District, Bucharest, Romania