

WEBSITE PRIVACY NOTICE

Updated on 1st June 2020

I. INTRODUCTION

1. Syngene International Limited ("**Syngene**") complies with the General Data Protection Regulation (EU) 2016/679 (thereafter the "**GDPR**"), California Consumer Protection Act ("**CCPA**") and the (Indian) Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data) Rules, 2011, which sets guidelines for the collection and processing of personal information from individuals. We have therefore established and created this Privacy Policy to inform you about the type of personal information we collect from you, how we use it and what options you have to limit our use of the personal data related to you ("**Personal Data**").
2. By accessing or using our website <https://www.syngeneintl.com/> ("**Website**") or by otherwise giving us your information, you will be deemed to have the capacity to enter into a legally binding contract as per the jurisdiction from which you are accessing the Website or giving us the information. You will consequently be deemed to have read, understood and agreed to the practices and policies outlined in this Privacy Policy and agree to be bound by its terms.

II. COLLECTION OF PERSONAL DATA

3. We may collect, store, use and disclose information about individuals which may constitute Personal Data for lawful, explicit and legitimate purposes and for further processing of Personal Data consistent with those purposes. When you provide information that enables us to respond to your queries, we will, wherever permissible by relevant laws, collect, the information for the purposes described in this Privacy Policy.
4. Syngene will not collect any Personal Data about you unless you voluntarily provide this information to us. Some of this information that you may provide will identify you personally, either alone or in combination with other information available to us.

Personal Data that you provide directly through websites or emails

5. We may collect Personal Data you choose to provide when you fill forms on or raise a query through our Website, or send emails, call us or write to us. If you contact us, we may keep a record of such correspondence. We may also collect Personal Data by asking you to complete surveys that we would use for research purposes, although you have a right not to respond to them.

Personal information that is automatically collected by us when you visit Website

6. The list of Personal Data collected through Website are notified to you at the time of granting permission to share the relevant information. Such information may include log data, cookie data, device information, demographic information, behavioural information and the sensitive personal data ("**SPD**"). We may use automated technologies including (where available) the use of web server logs to collect IP addresses, device details, browser types, cookies and web beacons which might help us in system administration, to filter traffic and improving effectiveness of Website and our marketing activities. By using the Website, and associated microsites, you agree to the processing of your personal information as explained in this Privacy Policy.

Personal Data that is collected from third party sources

7. You can engage with us through social media websites or through features on Syngene website that integrate with social media sites. When you engage with us through social media sites, you may allow us to have access to certain information from your social media profile based upon your privacy preference settings on such platform.

Personal Data that is collected when you access our Website through mobile devices

8. If you access our website on your mobile device, we may collect your Personal Data such as your IP address and device details apart from the Personal Data you agree to share with us.
9. When you provide us your mobile phone number, you consent to the use of your mobile phone number for the purposes identified in this Privacy Policy. If you choose to refrain from receiving any text notifications from us on your mobile, we will not be using your mobile number for such purposes unless required to meet legal requirements or legitimate business purposes for example screening CV's of prospective candidates, establishing communication with prospective customers and personnel with general/ business inquiries.

III. SHARING OF PERSONAL DATA

10. We have office operation in an international location i.e. Syngene USA Inc., and we share information between our group companies for administrative and legitimate business purposes.
11. Where required or permitted by law, information may be provided to others, such as statutory authorities, government institutions, regulators and law enforcement agencies for compliance with legal requirements.
12. We do not share personal information about you with third parties, except: (a) to provide products or services you have requested; (b) when we have your permission: or (c) under the following circumstances.
 - We may provide the information to trusted entities who work on behalf of or with Syngene as per the provisions of data privacy laws and under strict confidentiality agreements. These entities may use your Personal Data to help us communicate with you about for legitimate business purposes. However, these companies do not have any independent right to further share or disseminate this information.
 - We may use the information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.
 - We may share information where we believe it is necessary in order to investigate, prevent, or take action against any illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or as otherwise required by law.
13. We may share information where we believe it is necessary in order to protect or enforce Syngene's rights, usage terms, intellectual or physical property or for safety of Syngene or associated parties. From time to time, we may consider corporate transactions such as a merger, acquisition, reorganization, asset sale, or similar. In these instances, we may transfer or allow access to information to enable the assessment and undertaking of that transaction. If we buy or sell any business or assets, personal data may be transferred to a third parties involved in the transaction.

14. Where we transfer personal data outside of European Union (EU), we either transfer personal data to countries that provide an adequate level of protection (as determined by the European Commission) or have appropriate safeguards in place. Appropriate safeguards to cover these transfers are in the form of standard contractual/data protection clauses adopted by the European Commission and where transfers are to the US, we may rely on Privacy Shield certification.

IV. DATA STORAGE AND RETENTION

15. Your personal data is stored in databases of our trusted third-party service providers. We contractually require those third parties to keep data secure and confidential and we do not allow them to disclose your Personal Data to others without our authorization, or to use it for their own purposes.
16. Syngene shall retain your Personal Data pursuant to the business purposes and in line with our retention policies or as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your Personal Data are available in our retention policy. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

V. INDIVIDUAL RIGHTS

17. You may have certain rights relating to your Personal Data provided for under applicable law. These are the right to:
 - Request access to your Personal Data and the processing activities on the personal data.
 - Request that your Personal Data is rectified if it is inaccurate or incomplete
 - Request erasure of your Personal Data in certain circumstances.
 - Request restriction of the processing of your Personal Data in certain circumstances.
 - Object to the processing of your Personal Data in certain circumstances.
 - Receive your Personal Data provided to us as a controller in a structured, commonly used and machine-readable format in certain circumstances.
 - Lodge a complaint with a relevant authority.
 - Withdraw your consent provided at any time by contacting us.
18. You have the option to subscribe/ opt-in to receive our brochures, newsletters, marketing and research related materials. We respect your privacy considerations and provide you with the option to exercise your right to unsubscribe/opt-out to prevent marketing communications to you by writing to BDC@syngeneintel.com or click the “unsubscribe” link at the bottom of an email newsletter received by you from us. Syngene shall adhere to your preferences.
19. Where you have exercised your right to discontinue marketing communications to you, or have indicated your preference to remove your Personal Data from our customer relationship management (CRM) databases, we will retain minimum Personal Data to note that you opted out in order to avoid contacting you again.

20. To exercise the rights outlined above in respect of your Personal Data please contact the details available in the contact section below. We will endeavour to respond to you within appropriate timelines as required by the law.
21. Please note that Syngene may need to retain certain Personal Data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion.

VI. PROTECTION OF MINOR'S INFORMATION

22. The Website is not directed to children under the age of eighteen (18) years. Syngene does not knowingly solicit Personal Data from or market to anyone under eighteen (18) years of age. If you believe that we have received information from a minor, please notify us immediately and we will ensure that reasonable efforts will be made by us to delete such information from our database.

VII. EXTERNAL LINKS

23. Our Website may contain links to other sites including social media links (Stock Exchange – BSE/NSE, social media platforms, HR success factors), event sites etc. whose information practices may be different from ours/. You should read such third party's websites privacy notices prior to interacting or providing any of your Personal Information. Syngene does not control those sites or their privacy practices. We do not endorse or make any representations about third-party websites.

VIII. COOKIES AND OTHER TECHNOLOGIES

24. Our Website uses cookies and similar technologies to facilitate proper functioning of our Websites and to help collect data. A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that website can remember who you are. Please read our Cookie Policy for more details about the information we collect through cookies when you use this site.

IX. REASONABLE SECURITY PRACTICES & PROCEDURES

25. We have put in place reasonable security practices and procedures comprising of managerial, technical, operational and physical security controls that comply with all applicable laws and regulations to protect your Personal Data from unauthorized or inappropriate access, loss, alteration, disclosure, damage and destruction.
26. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator/supervisory authority of any suspected breach where we are legally required to do so. Users are responsible for maintaining the secrecy of their own passwords. If you have reason to believe that your interaction with us is no longer secure or a (for example, if you feel that the security of any account you might have with us has been compromised) or a Personal Data breach has occurred, please immediately notify us by contacting us at DPO@syngeneintl.com. Please refer to our breach management policy for more details.

X. CHANGES TO THIS POLICY

27. Please note that this policy may change from time to time. Changes to the policy will be approved and updated by DPO. Please visit our website to keep abreast of any changes to the policy.

XI. AFFILIATES

28. Please note that this Privacy Policy does not cover any Syngene affiliate or Syngene line of business that operates under its own separate privacy policy or specific privacy terms that are tailored for the different ways your Personal Data is collected by different Syngene lines of business.

XII. CONTACT US

29. If you have any Personal Data-related complaints, data protection concerns and any communications regarding enforcement of your privacy rights or questions regarding our privacy policy or the practices described herein, you may contact us at:

Data Protection Officer

Name:

Address:

Email id: DPO@syngeneintl.com