



STRIDES PHARMA SCIENCE LIMITED

Privacy Policy



1. Purpose of the Policy

At Strides Pharma Science Limited ("Strides") (hereafter referred to as "Strides," "we" or "company") we are committed to protecting the personal data of all individuals whose information we collect such as patients, employees, job applicants, customers, suppliers, vendor, contractors, partners, clinical trial participants and other personal information collected in due course. This Privacy Policy outlines how the company collects, uses, stores, shares, and protects data in compliance with applicable regulations including but not limited to EU's General Data Protection Regulation (GDPR) and India's Digital Personal Data Protection Act, 2023 (DPDP Act). The company's commitment to data privacy also includes a **zero-tolerance policy** for any form of data mismanagement.

2. Principles of Data Processing

Our data processing activities are based on the following principles together with any other prevailing global practices:

1. Lawfulness, Fairness, and Transparency;
2. Specified Purpose;
3. Data Minimization;
4. Accuracy of Data;
5. Storage Limitation
6. Data Integrity and Confidentiality;
7. Accountability of the Data Processor

Strides' wholly owned subsidiary, Arco Lab Pvt. Ltd (Arcolab) is responsible to collect, process and ensure protection of personal data of patients, employees, job applicants, customers, suppliers, vendor, contractors, partners, clinical trial participants etc.

Arcolab is an entity that provides and performs a myriad of specialized services for Strides. Arcolab's competence as a responsible service provider is augmented by its ISO 27001 (Information Security Management System) and ISO 27701 (Privacy Information Management System) certifications.

3. Scope and applicability

This Policy applies to all personal data collected, processed, and stored by Strides and its subsidiaries, across their global operations, platforms, and services.



This policy shall govern all Employees (including part time, temporary, contractual), workers, trainees, consultants, customers, volunteers of the Company, and its Subsidiaries, suppliers, contractors, and service providers integrated within the Strides ecosystem. This policy shall

extend across our value chain, defining our forward-thinking approach to collaborating with partners and setting clear standards for their operational conduct bound by strict contractual safeguards.

Depending on the association with the company, company may collect the following categories of personal data

- Patients and trial participants share health-related data, diagnoses, and biometric details for the purpose of scientific research and clinical trials;
- Employees, contractors, and potential job applicants' documents containing information on their identity, contact information, professional experience and other information required for employment purpose (including details of family members to comply with employee benefit requirements such as medical insurance, SEBI's requirement on Insider Trading compliance or any other legitimate purpose);
- Visitors to our website share digital information such as their IP address and browsing preferences.

Data collected by Arcolab on behalf of Strides group of entities is protected in accordance with Arcolab's policy and procedures.

Strides' website may also passively gather certain information about your visits without requiring you to actively submit it. This data may be collected through various technologies such as cookies, internet tags, and web beacons.

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.



You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Examples of the information captured include the URL of the previously visited website, IP address, GPS location, mobile service provider, operating system details, and browser version. These passive data collection methods help the company to enhance your browsing experience by enabling better service delivery, tailoring content to user preferences, compiling usage statistics, analyzing trends, and improving overall website functionality. The information collected through these technologies cannot personally identify the data principle/subject unless combined with other identifiable details.

To protect their privacy, data principle/subject may choose to accept or defer from providing information that is not specifically requested by the company. When you register using third-party accounts such as Facebook, Twitter or Gmail, Strides may access the necessary information from those accounts to facilitate your registration, maintain ongoing communication, and deliver applicable services.

4. Security and Confidentiality

Strides is committed to ensuring that personal information collected/processed is secured. In order to prevent unauthorized access or disclosure, the company has put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information company collects. Our systems are safeguarded through role-based access controls, advanced encryption, intrusion detection mechanisms, and secure data backups.

On a need basis, under strict contractual safeguards and as per statutory requirements, the company may share information- with regulators, research partners, or service providers.

Personal Information collected will be retained only for as long as necessary to fulfill the purpose for which it was collected or to meet applicable legal or regulatory obligations.

In the unlikely event of a data breach, a clearly defined incident response plan is promptly activated. Since the company is committed towards transparent investigation and resolution, affected data principals/subjects and authorities are notified within prescribed timelines. If data is transferred outside India, we shall follow adequate regulatory procedures to ensure maximum protection.

To uphold our commitment towards data protection, company commits to conduct internal and independent audits periodically.



To better facilitate processing of personal data, Strides outsources a part of its activities to Arco Lab Private Limited, a wholly owned subsidiary of Strides. Arcolab is an entity that provides and performs a myriad of specialized services for Strides. Arcolab's competence as a responsible

service providers are augmented by its ISO 27001 (Information Security Management System) and ISO 27701 (Privacy Information Management System) Certifications.

The details of any sub-processor appointed by any processor for the purpose of processing the personal data shall be shared with Data principals/subjects upon the appointment of the aforementioned sub-processor.

5. Data Principle/subject right

The company believes that privacy rights should be accessible and actionable. **Data principals/subjects** have the right to know what data the company holds about them, request correction or deletions, and to request data transfer—either with their consent or for the purpose of fulfilling a contract or statutory obligation—to another organization. Additionally, **data principals/subjects**, in line with procedure established by law, may withdraw their consent at any time; however, this will not impact the legality of any data processing carried out prior to the withdrawal.

As a **Data Principle/subject right**, you may:

- Request **access** to personal data;
- Seek **correction** of inaccurate data;
- Request **deletion** of personal data, subject to exceptions;
- **Withdraw consent** at any time (without affecting past processing);
- **Restrict or object to processing**;

To ensure transparency in data protection, we have appointed a Data Protection Officer (DPO), in compliance with various legislations, who is supported by a cross-functional governance team. You can reach out to the DPO, Ms. Prathima P D at dataprotection@strides.com.

6. Periodic Review

This policy shall be subject to mandatory review at least once in every one year and as may be deemed necessary and in accordance with regulatory amendments and international guidelines.

Glossary of Key Terms

Term	Definition
Consent	Freely given, informed, and unambiguous agreement by the data subject for the processing of their personal data.
Cookies	Small data files stored on a user's device by websites to remember preference or track activity for analytics and performance.
Cross-Border Data Transfer	The transfer of personal data outside the country where it was originally collected, subject to applicable privacy safeguards.
Data Breach	Any unauthorized access, disclosure, or loss of personal data. It requires notification and remediation under applicable laws.
Data Controller	The entity (in this case Strides) that determines how and why personal data is processed.
Data Processor	A third party (such as vendors, service providers) that processes personal data on behalf of the data controller.
Data Protection Officer/ Office (DPO)	The designated individual/ team responsible for ensuring compliance with data protection obligations and addressing privacy-related queries or concerns.
Data Subject	Any individual whose personal data is collected or processed (such as patients, employees, healthcare professionals).
Personal Data	Information that identifies or can be used to identify an individual, such as name, email address, contact information, health records and IP address.
Right to access/ erasure	The data subject's right to request access to their data or request its deletion under applicable laws.
Web beacon	Tiny graphics embedded in emails or web pages used to monitor user interactions at the website for the purpose of web analytics.
