

Healthcare Professionals (HCP's) Privacy Notice

Last Updated Date: May 18, 2026

Alkem Laboratories Ltd (“**Company**”, “**Alkem**”, “**we**”, “**us**”, “**our**”) is committed to protecting the privacy and security of Personal Data in accordance with applicable data protection laws, including the Digital Personal Data Protection Act, 2023 (“**DPDPA**”).

This Healthcare Professionals (HCP's) Privacy Notice (“**Notice**”) applies to registered medical practitioners, healthcare professionals, physiotherapists, psychologists, nutritionists, nurse practitioners, registered medical practitioner’s assistants, practicing pharmacists and other medical subject matter experts who engage with Alkem (collectively, “**Healthcare Professionals (HCP's)**” or “**Data Principals**”), including those who attend, participate in, or collaborate on medical, educational, scientific, research and development or promotional initiatives organized by Alkem.

This Notice describes how Alkem collects, receives, stores, uses, discloses, shares, and otherwise processes Personal Data from such Healthcare professionals (“**Healthcare Professional (“HCP”) Personal Data**”) in connection with its business operations.

1. Types of Personal Data Collected

Alkem may collect, hold, use, and process the following categories of HCP's Data, including but not limited to:

- i) **General Personal Data:** Name, Clinic Address, Full Clinic/Residential Address, Area of Practice/Specialization, Phone Number, Landline Number, Email ID, Photographs, Signature, Event related attendance/photo/video recording, Complaint Details, Destination of Travel, Date of Travel, Qualifications.
- ii) **Government Identifiers:** PAN, Aadhaar, Medical Registration Number, GST Number etc
- iii) **Financial Data:** Bank Account Details, Cancelled Cheque, Honorarium Payment Information etc
- iv) **Identifiers:** Social Networking Username, Latitude, Longitude.
- v) **Technical and network activity information:** information about your device and your usage of our websites, apps and systems, including your IP address, device ID, hardware model and version, mobile network information, operating system and other online identifiers, type of browser, browsing history, search history, access time, pages viewed, URLs clicked on, forms submitted, and physical location;
- vi) **Professional/Engagement Data:** Curriculum Vitae (CV), qualification, experience, specialization

2. Purpose of Collection

Alkem collects, holds, uses, and otherwise processes HCP's Personal Data for the purposes described below, or for purposes which are reasonably compatible with the ones described below:

- Processing for consent as a lawful basis such as:

- i. To engage with HCP's and develop a scientific collaboration
 - ii. To execute consultant/research agreements with HCP's
 - iii. Conducting Seminars / Workshops / Conferences
 - iv. Conducting marketing, promotional and/or patient awareness/education activities/initiatives/campaigns/camps
- Processing for legitimate uses where processing is necessary such as:
 - i. For compliance to UCPMP/UCMPMD/MCI/NMC guidelines and record keeping
 - ii. For Social Media Complaint Handling
 - iii. To conduct various internal and external audits
 - iv. Establishment and defense of legal claims
 - v. Addressing any complaints and ensuring appropriate resolution

Where required under applicable law, Alkem will obtain consent prior to processing Personal Data.

3. Disclosure and sharing of Healthcare Professionals (HCP'S) Personal Data

As a part of its normal business operations, Alkem may disclose the HCP's Personal Data in the manner detailed below. HCP's Personal Data is shared with only those parties that provide an adequate level of data protection by implementing appropriate technical and organizational security measures as prescribed by applicable law. We do not sell HCP's Personal Data to anyone.

- **Internal stakeholders** on a need-to-know basis
- **Group entities and affiliates** for business and operational purposes
- **Service providers and vendors** e.g., IT, logistics, vendors, payment processors, event agencies, marketing agencies subject to appropriate safeguards
- **Regulatory authorities, government bodies, or law enforcement agencies**, where required by law
- **Third parties in connection with business restructuring**, including mergers, acquisitions, or transfers.

5. Transfer of Healthcare Professionals (HCP'S) Personal Data Outside India

Alkem operates globally and may transfer the HCP's Personal Data in territories outside India for the purposes described in this Notice and in accordance with applicable data protection laws in such territories. Such transfer of Healthcare Professionals (HCP's) Data may be to its affiliated or group companies or to third parties, primarily for business and operational purposes.

6. Retention Of Healthcare Professionals (HCP'S) Personal Data

Alkem will retain HCP's Personal Data for as long as reasonably considered necessary for achieving the purposes detailed in this Notice and as is permissible under applicable law. Alkem may further retain Personal Data for longer periods where required for legal, regulatory, or contractual purposes, or for the establishment, exercise, or defense of legal claims.

7. Security Practices and Procedures

Alkem has adopted reasonable security safeguards in compliance with applicable laws to secure HCP's Personal Data. Alkem also ensures that the third parties to whom HCP's Personal Data is transferred or disclosed will have at least the same level of security practices as that followed by Alkem.

8. Your Rights in Connection with your Personal Data

In relation to your Personal Data, you have the following rights:

- **Right to access:** You can request access to your Personal Data held by Alkem.
- **Right to correction:** You have the right to correct any inaccurate or incomplete Personal Data. You have the responsibility of informing Alkem if there are any changes or inaccuracies in your Personal Data.
- **Right to erasure:** You have the right to request the erasure of your Personal Data in certain circumstances. If you believe that we should discontinue the use of your Personal Data, you have the option to request the deletion of your Personal Data. Alkem shall delete the Personal Data unless retention is necessary for compliance with any law or code for the time being in force.
- **Right of grievance redressal:** If you have any grievance related to the processing or handling of your Data you may write to us at dataprivacy@alkem.com
- **Right to nominate:** You have the right to nominate another individual to exercise your rights in case of your death or incapacity in accordance with applicable law
- **Right to withdraw consent:** You have the right to withdraw your consent for the activities you had consented for, although the right will have limited applicability as only in cases where consent-based processing does apply. The withdrawal of consent previously granted for the processing of personal data does not affect the lawfulness of the processing until the withdrawal. However, opting out will result in cessation of the respective activity or engagements

For exercising any of the above rights, you can write to dataprivacy@alkem.com. You may be asked to furnish proof of your identity before you can exercise these rights. Alkem may not be able to process any requests made in the event you fail to establish your identity, or if we are unable to authenticate your identity.

If you believe that we have not adequately addressed your request or concerns, you have the right to file a complaint with the Data Protection Board. However, you are encouraged to contact Alkem first, as we welcome the opportunity to investigate and resolve any concerns.

We are committed to cooperating with the Data Protection Board in the resolution of any complaints and ensuring that all concerns are addressed in a timely and appropriate manner.

9. Changes to this Privacy Notice

We may update this notice from time to time. We encourage you to review this Notice periodically so that you are aware of any changes. The updated Notice will take effect as soon as it has been uploaded.