

Alkem's Privacy Notice for Pharmacovigilance, Medical information and Product complaints

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 Privacy Notice for Pharmacovigilance, Medical Information and Product Complaints (**"Notice"**) applies to patients, consumers, healthcare professionals, and other individuals whose Personal Data is collected or processed by Alkem in connection with:

- pharmacovigilance activities (including adverse event reporting, safety monitoring, and signal detection),
- medical information requests, and
- product quality complaints

(collectively referred to as **"Data Principals"**). This Notice describes how Alkem collects, receives, stores, uses, discloses, shares, and otherwise processes Personal Data of such individuals to comply with its legal, regulatory, and business obligations.

1. Types of Personal Data Collected

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

- **For Pharmacovigilance:** We collect the name (initials), contact details, and affiliations/profession of the reporting individual. We collect some additional personal data related to health and medical history of the individual experiencing an adverse event if required for processing of adverse event for pharmacovigilance purposes. Health data may include Medical History, Medical Reports, Study Data (Dosage, Reactions, Outcomes), Weight, Height, Description of the adverse event, Date of adverse event, Outcome of the event, Laboratory test details, Reason for drug use, Self-medication details, Dosage of medication.
- **For Medical Inquiries:** We may collect the name, contact details and affiliation/profession of the individual making the inquiry.
- **For Product Complaints:** We may collect the name, contact details and affiliation/profession of the individual reporting the complaint. We may collect some additional personal data related to the health and medical history of the individual affected by the product complaint if such information is relevant to evaluate, classify and assess the product complaint.

1. Purpose of Collection

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

Processing for Legitimate Uses

- To monitor, detect, assess, and report adverse events and ensure drug safety (pharmacovigilance obligations)
- To respond to medical information requests and safety-related queries
- To investigate and resolve product quality complaints
- To comply with applicable legal and regulatory obligations, including reporting to health authorities
- To maintain records required for audit, inspection, and compliance purposes
- To establish, exercise, or defend legal claims

1. Disclosure and Sharing of Personal Data

As a part of its normal business operations, Alkem may disclose the Personal Data in the manner detailed below. 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 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, payment processors), 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

1. **Transfer of Personal Data Outside India**

Alkem operates globally and may transfer the 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 Personal Data may be to its affiliated or group companies or to third parties, primarily for business and operational purposes.

1. **Retention of Personal Data**

Alkem will retain the 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.

1. **Security Practices and Procedures**

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

1. **Your rights in connection with your Personal Data**

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

- **Right to access:** Individuals can request access to their Personal Data held by Alkem.
- **Right to correction:** An individual has the right to correct any inaccurate or incomplete Personal Data. The individual is responsible for informing Alkem if there are any changes or inaccuracies to their Personal Data.
- **Right to erasure:** Individuals have the right to request the erasure of their 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 for the time being in force.
- **Right of grievance redressal:** Any grievance related to the processing or handling of the Personal Data shall be intimated to the Grievance Officer at dataprivacy@alkem.com.
- **Right to nominate:** Individuals have the right to nominate another individual to exercise their rights in case of death or incapacity
- **Right to withdraw consent:** Individuals have a right to withdraw their consent for the activities they 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 services

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 at. 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.

1. 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.