Healthcare Professionals Privacy Notice

Last updated: January 2026

1. Introduction

Lupin Neurosciences, a Specialty Pharma Division of Lupin Atlantis Holdings SA, and Lupin Healthcare (UK) Limited (each as applicable "**Lupin**" or "we") are committed to improving the lives of patients affected by underserved medical conditions and interacts with different third parties such as healthcare professionals, medical professional, personnel and staff at healthcare institutions, government authorities, non-profit organizations, key opinion leaders (altogether "HCPs"), healthcare organizations, ("HCOs"), patients and patient organizations ("POs)" (altogether "Healthcare Community") in many ways. Therefore, data protection and data security are very important to us.

This Privacy Notice ("Notice") communicates to you how Lupin collects, processes, uses and discloses information about you ("Personal Data") when we interact with you and how we protect it.

As further outlined below, we collect Personal Data during our engagements and interactions (both solicited and unsolicited) with you, both in-person and online. We also collect Personal Data from certain third party sources we have described below.

This Privacy Notice also describes your data protection rights, including a right to object to some of the processing which Lupin carries out. More information about your rights, and how to exercise them, is set out in the "*Your choices and rights*" section.

We may provide you with additional information when we collect Personal Data, where we feel it would be helpful to provide relevant and timely information.

Please note that the Lupin group has designated Lupin Healthcare (UK) Limited as representatives under applicable medical regulations for pharmacovigilance activities in the United Kingdom. This means that these entities are responsible for the processing of data in connection with such activities (including but not limited to the reporting of adverse effects). Please note that this Privacy Notice does not cover the processing of HCP Personal Data for pharmacovigilance and product quality purposes. For further information on how HCP Personal Data is processed for pharmacovigilance and product quality purposes, please see *PV-Privacy-Notice-April-2025.pdf*.

2. Data Controller

The body that determines how and why your Personal Data is processed is defined as the "Controller". The Controller of your Personal Data is:

Lupin Healthcare (UK) Limited
The Urban Building, 3-9 Albert Street Slough, SL1 2BE, United Kingdom Phone: +44 (0)1565 751 378 E-Mail: information@lupin.com

Compliance with applicable laws

When using your Personal Data, Lupin as Controller will always comply with the relevant data privacy and data protection laws, which includes regulatory and national law requirements that may apply to such use and processing and, where applicable, giving you the specific rights that apply in the country where you reside (altogether "Applicable Data Protection Law")

3. Data Protection requirements

Lupin will comply with data protection law. This means that the Personal Data we hold about you must be:

a) Used lawfully, fairly and in a transparent way;
b) Collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
c) Relevant to the purposes we have told you about and limited to those purposes only;
d) Accurate and kept up to date;
e) Kept only for such time as is necessary for the purposes we have told you about; and
f) Kept securely

4. What Personal Data does Lupin process and for which purposes and legal bases?

Lupin may process the following categories of data about you where permissible:

- Personal Basic Information: your name, title, date of birth, Identity proof
- Contact Information: postal address, phone number, email address
- Nationality ID Information, travel-related and other identification information: including your national ID number, passport number, tax identification number; where necessary and permissible
- Professional qualification information: CV including data related to your education, professional registration number, professional affiliations (e.g., job title, memberships in medical societies or HCP networks), practicing certificate, publications, other professional achievements, professional photo, recruitment and training records
- Financial data: Bank Account Details
- Your interests: such as your specialty or healthcare topics about which you request information from us
- Device information: potentially including online identifiers and data relating to email clicks and opens

	Purpose for processing Personal Data	Data Category	Lawful basis
Marketing authorizations and Regulatory Affairs	Inclusion of HCP Personal Data in order to satisfy legal and regulatory requirements as part of premarketing authorizations; as part of the Dossier submitted to relevant authorities during premarketing stage; and post-market authorizations	• Personal Basic Information • Contact Information • Nationality ID / travel related / other ID Information • Professional qualification information • Financial data	• Legal obligation
Transfers of value	As an affiliate member of the Association of British Pharmaceutical Industry (ABPI), Lupin complies with the codes enacted by ABPI, including the ABPI Code on Disclosure of Transfers of Value. Lupin will publish Transfer of Value information on an individual named basis, and will also retain Transfer of Value information on an aggregated level for research & development purposes..	• Personal Basic Information • Contact Information • Nationality ID / travel related / other ID Information • Professional qualification information • Transfer of value details (including fees for consultancy services, travel and accommodation expense)	• Legal obligation • For publication on an individual named basis: our legitimate interest in maximizing transparency in our Transfers of Value activities • Our legitimate interest in understanding trends in Transfer of Value-related transactions to ensure compliance and improve our business model

Relationship management	• Responding to your inquiries and your requests, • Enforcing the contractual terms and conditions that govern our relationship with you (e.g., medical events, publications, advisory meetings, etc.) • Engaging with you as a scientific expert or a key opinion leader in the relevant therapeutic areas based on your professional expertise and opinions and contacting you with business inquiries, to the extent forming part of your consultancy arrangement with us (including inviting you to attend congresses/panels, HCP professional meetings and educational activities)	• Personal Basic Information • Contact Information • Nationality ID / travel related / other ID Information • Professional qualification information • Financial data	• Contract; (of if the contract is not with the individual HCP) legitimate interests in administering the Lupin's activities and relationships with HCPs
Product complaints and adverse events	• Pharmacovigilance: for receiving and processing reports from you of information about adverse events (including those you provide to us as part of our engagement	• Personal Basic Information • Contact Information • Adverse events/complaints information • Professional qualification information	• Legal obligation • To the extent no legal obligation is applicable: Contract (to the extent necessary to perform our consultancy arrangement with you) or our legitimate

	with you under our consultancy arrangement), including those relating to product complaints, adverse occurrences, and product safety • For information about how *patient* data is processed for product complaint and adverse event purposes, please see our *Privacy Notice on Pharmacovigilance*	•	interests in ensuring we obtain appropriate contextual information as part of our PV activities (if the contract is not with the individual HCP, or if the information is disclosed other than as part of the consultancy arrangement)
Operate our business to comply with our legal obligations or to maintain operating when interacting our legitimate interests	• Compliance with our reporting and regulatory monitoring requirements which we are obliged by law • For due diligence purposes as part of compliance with anti-corruption laws and transparency requirements • To ensure appropriate remuneration based on professional qualifications – to comply with Fair Market Values ("FMV") • Protect rights, privacy & security and property of Lupin and our affiliates, you or others	• Personal Basic Information • Contact Information • Nationality ID / travel related / other ID Information • Country of registration • Professional qualification information • Financial data	• Legal obligation

	• Transfer of Value Disclosure: fulfillment of compliance obligations under the Medicines for Europe Code of Conduct		
Direct marketing and disease awareness, market research	• Contacting you with direct marketing which may be targeted depending on your interests, including sending you event and panel invitations and contacting you with inquiries (to the extent these do not form part of our consultancy arrangement with you) • Contacting you with disease awareness materials • Contacting you with surveys and market research • Measuring your engagement with direct marketing emails we send you using pixels	• Personal Basic Information • Contact Information • Your interests • Device information (for email pixel tracking)	• Consent • Where consent is not required under applicable law (for example and depending on your jurisdiction, certain marketing, survey and disease awareness communications): legitimate interests (our legitimate interest in commercializing, raising awareness of, and improving our products and services)

5. How do we collect your Personal Data?

Directly from you: Lupin collects information about HCPs directly from you (HCPs) in the following scenarios, where you:

- Engage with one of our sales representatives, medical science liaisons, or other employee engaging with HCPs, HCOs, POs;
- Attend an online event such as a webinar or contact us via our website;
- Respond to any surveys that you may choose to participate in;
- Attend face-to-face meetings, such as advisory boards or conferences

We collect information about you (such as name, contact details, research interests, professional qualifications) from other sources:

- Data companies providing information services in the healthcare sector
- Publicly accessible sources
- Joint marketing partners;
- Marketing vendors;
- Healthcare provider directories;
- Your patients (where they have told us that you are their healthcare provider);
- Patient organizations;
- Caregivers or other medical professionals;

6. Sensitive Personal Data

We do not process sensitive Personal Data relating to HCPs (such as information related to racial or ethnic origin, political opinions, religion or philosophical beliefs, health, sex life or sexual orientation, criminal background, or trade union membership, or genetic data)..

If we process your sensitive Personal Data as a patient (for example, if you are a participant in a clinical study), we will provide a separate privacy notice to you, either directly or via our partners.

7. Where is your data accessed from / transferred to?

Your data may be transferred to other European affiliates or other Lupin entities, or trusted third party service providers outside the UK, European Economic Area (EEA) or Switzerland to (as applicable) the EEA, UK, Switzerland, or India.

- In the event of cross-border data transfer, the relevant national requirements for disclosing Personal Data abroad must be met. Data is transferred outside the UK, EEA or Switzerland on the basis of data processing agreements incorporating the applicable standard contractual clauses according to the respective data protection requirements and other safeguards, such as Standard Contractual Clauses for the transfer of Personal Data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council and/or the UK International Data Transfer Addendum, or the UK International Data Transfer Agreement. A copy of the relevant mechanism that is employed to guarantee the safety of your Personal Data can be obtained for your review on request by using the contact details below.
- Alternatively, where an adequacy decision (or equivalent) is available we will rely on that adequacy decision. To the extent Personal Data is shared between the UK, EEA and

Switzerland, this relies on the adequacy decisions/regulations in place for transfers between those jurisdictions.

Some third parties that process Personal Data on our behalf are deemed Data Processors under the applicable data protection regulations. Lupin is expressly obliged under the Applicable Data Protection Law to enter into a contract or Data Processing Agreement ("DPA") with its Data Processors. This DPA ensures access by Data Processors to Lupin data remains compliant with the applicable law. Lupin therefore guarantees to enter into a DPA with any and all Data Processors that exist and that may exist in the future. Data Processors are further prohibited from using the Personal Data for any purpose other than to perform the services as instructed by Lupin.

Depending on the purposes we share your Personal Data with the following third parties:

- Authorized staff from Lupin or its representatives acting on Lupin's behalf, subject to applicable data privacy laws
- Regulatory authorities (Government/Regulatory Agencies) and ethics committees pursuant to applicable laws;
- Third parties with which Lupin collaborates and which are processing Personal Data as a data processor under Lupin's instruction, but only after taking reasonable steps to ensure that we can share such information in compliance with applicable privacy laws. These include for example hosting and CRM providers, and medical service information providers.
- Commercial Partners, for example co-marketing and distribution partners (for commercialization in certain jurisdictions)
- Disclosure of Transfer of Value
- Third-party buyers or assignees to facilitate the sale of Lupin or its business

8. Disclosures of Transfer of Value

As affiliate member of ABPI Lupin Healthcare (UK) Limited ("Lupin") is committed to adhering to and supporting the Medicines for Europe Code of Conduct (the "Code"). The Medicines for Europe Code of Conduct, of which Lupin is a member, has established a number of rules which Lupin complies with. As a result, Lupin began gathering, documenting, publishing, and sharing data about any value transfers (whether directly or indirectly funded such as payment of professional fees, travel, accommodations and out of pocket expenses) made to the Healthcare Community.

In particular, Lupin is required to record the precise amount of direct and indirect payments, whether in cash, in kind, or another form, made to an HCP or for the benefit of an HCP, as well as the various types of non-monetary benefits received from Lupin (directly or indirectly), such as services provided by a third-party vendor hired by Lupin, the relevant reporting period and the purpose of the transfer of value.

Lupin discloses this Personal Data on an individual named basis per our legitimate interests described above..

The reporting period is the relevant calendar year. Disclosures shall be made once a year, generally no later than 30 June for the preceding calendar year. Information disclosed shall remain on the website (https://www.abpi.org.uk/reputation/disclosure-uk/) for a minimum of 3 years after the time such information is first disclosed.

9. Change of purpose

Lupin will only use your Personal Data for the purpose for which it was collected unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your Personal Data for an unrelated purpose, we will advise you of this and explain the legal basis which allows us to do so.

You should be aware that we may process your Personal Data without your knowledge or consent where this is required or permitted by law.

10. For how long do we keep data?

In some jurisdictions, we are legally required to keep your Personal Data for certain periods. How long depends on the specific legal requirements of the jurisdiction you are in when you share your information with us.

We will retain your Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained and as outlined in this Privacy Notice.

The criteria used to determine our retention periods include:

(i) the length of time we have an ongoing relationship with you;
(ii) whether there is a legal obligation to which we are subject; or
(iii) whether retention is advisable in light of our legal position (such as in regard to the enforcement of applicable contract terms, applicable statutes of limitations, relevant accounting periods or fiscal years, litigation or regulatory investigations).

11. How does Lupin protect your data?

Lupin takes the security of our data seriously. Lupin has internal policies and controls in place to prevent your data being lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

When Lupin engages third parties to process Personal Data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organizational measures to ensure the security of data.

12. Data of Minors

If you are providing us with Personal Data of individuals under the age of eighteen (18), you represent that you have the appropriate authority to do so, and that you can demonstrate such authority to Lupin upon request. Please note this is not related to the legal basis we rely on to process Personal Data of these individuals from a data protection perspective.

13. Your Choices and Rights

As a data subject, you have a number of rights depending on your jurisdiction and any applicable exemptions. You can:

a) access and obtain a copy of your data on request (known as a "data subject access request");
b) require Lupin to change incorrect or incomplete data (known as "right of rectification");
c) request erasure of your personal information. This enables you to ask Lupin to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing (known as "right of erasure");
d) object to the processing of your data for example where Lupin is relying on its legitimate interests as the legal ground for processing, or where the data is being processed for direct marketing purposes (known as "right of objection");
e) ask Lupin to suspend the processing of your Personal Data for a period of time in certain circumstances, including if data is inaccurate or there is a dispute about its accuracy or the reason for processing it (known as "right to restriction of processing");
f) receive your provided Personal Data from Lupin in a structured, commonly used and machine-readable format ("known as "right to data portability"); and
g) Lodge a complaint with the competent a supervisory authority.

In addition, where we have asked for your consent, you may withdraw consent at any time. If you ask to withdraw your consent to Lupin processing your data, this will not affect any processing which has already taken place at that time.

These rights may be limited, for example if fulfilling your request would reveal Personal Data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep.

14. Contact information

If you are an HCP and would like to exercise above mentioned rights, you can contact the Controller (see first section of this privacy notice). You can also withdraw your consent to direct marketing communications by using the unsubscribe/opt-out feature at the bottom of our email marketing communications.

If you have questions or concerns about this Privacy Notice or the processing of your Personal Data, you may also contact our external Data Protection Officer for all EU and UK -Lupin entities at:

Bird & Bird DPO Services SRL
Avenue Louise 235 b 1
1050 Brussels, Belgium
Email: dpo@lupin.com

15. Updates to this privacy notice

As changes to the law or changes to our corporate processes may require an adaptation of this Privacy Notice and we refer to this page to review and read this website Privacy Notice regularly. We will provide you with a new privacy notice when we make any substantial updates. The most current version of this statement can be accessed on this website any time under "Privacy Notice", saved and printed out. This Privacy Notice was last updated as of the "Last Updated" date shown above.