**Website Privacy Notice**

Last updated: June 2025

Data protection and data security are important to Lupin Healthcare (UK) Limited (hereinafter "**Lupin**", "**we**" or "**us**"). This privacy notice (or "**Notice**") communicates to you how Lupin will make use of information that identifies or can be reasonably used to identify you ("**personal data**") when you visit the website at www.lupinhealthcare.co.uk (the "**Site**"), and describes your data protection rights, including the 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.

In addition, this Notice explains how your information is collected by cookies and other tracking technologies (together "**cookies**") when you are using the Site. For more information, see the section on "Cookies" below.

## 1. 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
Website: www.lupinhealthcare.co.uk

You can contact us at the details above if you have questions about this Notice or wish to contact us for any reason in relation to our personal data processing or use of cookies.

## 2. 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 law**").

## 3. Data Protection Requirements

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

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have explained to you clearly and not used in any way that is incompatible with these purposes;
- relevant to the purposes we have told you about and limited to those purposes only;
- accurate and kept up to date;
- kept only for such time as is necessary for the purposes we have told you about; and

- kept securely.

**4. What Personal Data Does Lupin Process and for Which Purposes?**

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behaviour. Information that cannot (or only with a disproportionate effort) be referred to your person, e.g. by anonymising the information, is not personal data.

**5. Data Processing**

a) Device information

When you access and use the Site, we collect the personal data that your browser automatically transmits to our server. This information is temporarily stored in a log file and is only used for essential purposes.

This may include the following information ("**Device Information**"):

- IP address;
- main language of browser;
- URL of the page that was viewed prior to the current page – i.e. the website from which access was made (the "**referrer URL**");
- screen resolution;
- type of browser, device, and operating system; and
- the name of your internet access provider.

b) Personal data we collect from you

We collect your personal data, including Device Information, from you and process it for the following purposes and based on the following legal bases under the GDPR (where applicable).

In addition to the below, the Site collects limited information (but not browser feature information) using our third-party analytics partner and reviews this on an aggregated basis to analyse metrics such as the number of visits and pages visited on our Site. We do this based on our legitimate interests in optimising the Site to give a better experience to our users.

| **Category of personal data** | **Purpose for processing** | **Legal basis** |
|---|---|---|
| Device Information | To the extent necessary for the provision of a secure and functional website. | Our legitimate interest in ensuring your user experience is optimised to your needs |
| Contact information (such as your name and e-mail address), and such information which you provide to us in an email or via telephone conversation (for example: information about | On the Site, we offer you the opportunity to get in contact with us via telephone call or email:<br>• for general enquiries and customer services; | Our legitimate interest in being able to respond to your query and assign your request, necessity for our performance of a contract with you as well as our legal obligations. |

| Category of personal data | Purpose for processing | Legal basis |
|---|---|---|
| your (medical) inquiry and, if applicable, your health data) | • for medical information; or<br>• to order patient alert cards. | |
| Contact information (such as your name and e-mail address) (Business users/HCPs only) | To send you direct marketing in relation to our relevant products and services, or other products and services provided by us and our group companies. | Consent |
| Sender ID and email / message / file content (including for senders outside of Lupin) | We monitor our IT systems for security purposes and to enforce our acceptable use policies (including through the use of data loss prevent tools). | Legitimate interest in maintaining the security of our IT systems and in ensuring compliance with our acceptable use policies. |
| Contact information (such as your name and email address) | We initiate recruitment for clinical trials/research via patient organisations/healthcare professionals. | Legitimate interest to provide contact information of potential trial participants to relevant organisations.<br><br>Consent (where required) |
| All information listed above | We may be required by applicable law to disclose the information listed above, including Device Information in our server logs, to law enforcement bodies or regulators. | Legal obligation<br>Legitimate interests in connection with legal claims, compliance, regulatory and investigatory purposes. |

c) Pharmacovigilance / reporting of adverse effects

Please note that the Lupin Group has designated IQVIA as representative for pharmacovigilance activities in the UK. This means that this entity is responsible (on Lupin's behalf) for the processing of data in connection with such activities (including, but not limited to, the reporting of adverse effects). For further information, please see IQVIA - Privacy Statement

For information about how Lupin processes pharmacovigilance-related personal data as controller, please see Lupin's pharmacovigilance privacy notice.

d) Applicant data

For information how Lupin processes personal data in connection with a job application, please see Lupin's applicant notice.

**6. Retention**

a) Scope and purpose of processing

We retain your personal data for no longer than is necessary for the purposes for which it is processed. More particularly:

- in general, we apply a retention period of no more than 6 months;
- where we process personal data for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period of 5 days after this (to allow us to implement your requests) and keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future;
- further storage may take place in individual cases if this is required by applicable law.

After these periods, we will delete your personal data.

**7. Data Sharing**

We share your personal data with the following categories of recipient:

- our analytics partner – we use a third-party analytics partner to perform analytics, for example: we share your data with Matomo Analytics Cloud (provider: InnoCraft Ltd, 7 Waterloo Quay, PO Box 625, 6140 Wellington, New Zealand), and your data will only be processed by Matomo in the UK for the purpose stated above;
- our hosting provider – the Site is hosted by a third-party provider on servers located in the UK;
- other service providers – for example: technical support providers to ensure your browser displays the Site correctly;
- our other group companies;
- our customer relationship management provider (Business/HCP contacts only);
- patient organisations/HCPs (where relevant to clinical trial/research participation); and
- our other group companies

In some scenarios, we may be required to share your personal data with law enforcement agencies or regulators in accordance with applicable law.

In the event that our business is sold or integrated with another business, your details will be passed to the new owners of the business in order to continue to operate the Site.

**8. International Transfers**

The Site is hosted on secure servers in the UK and will be processed by our analytics partner in the UK.

For transfers between the UK, EEA and Switzerland, we rely on appropriate adequacy decisions by the European Commission or the UK/Swiss Governments.

Due to the global nature of our business, personal data that we collect may be transferred to and stored at a destination outside the UK, EEA or Switzerland (for example: the United States). Where these locations do not provide an adequate level of data protection, we ensure appropriate safeguards are in place to protect the transfer of your personal data to these countries. For transfers to the United States, we rely on the Standard Contractual Clauses ("**SCCs**") and the UK Addendum to the SCCs. You can obtain a copy of these transfer mechanisms using the details under "Contact Information" below.

## 9. Your Rights as a Data Subject

If you are based in Switzerland, the UK or the EU, you have at least the following rights:

| Right | Summary |
|---|---|
| The right of access | Enables you to receive a copy of your personal data |
| The right to rectification | Enables you to correct any inaccurate or incomplete personal data we hold about you |
| The right to erasure | Enables you to ask us to delete your personal data in certain circumstances |
| The right to restrict processing | Enables you to ask us to halt the processing of your personal data in certain circumstances |
| The right to object | Enables you to object to us processing your personal data on the basis of our legitimate interests (or those of a third party). Your objection will be upheld, and we will cease processing your personal data, unless the processing is based on compelling legitimate grounds or is needed for the exercise or defence of legal claims that may be brought by or against us |
| The right to data portability | Enables you to request us to transmit personal data that you have provided to us to a third party without hindrance, or to give you a copy of it so that you can transmit it to a third party, where technically feasible |

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

If you wish to exercise any of these rights, please email us at information@lupin.com so we can assist you. Please note that, in some cases, we may request additional information from you to verify your identity before we can respond to your request.

Wherever we rely on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. We may, however, have other legal grounds for processing your data for other purposes, such as those set out in the "Data Processing" section above.

## 10. Cookies

a) What are cookies and other tracking technologies?

A cookie is a very small text document, which often includes an anonymous unique identifier. Cookies are created when your browser loads a particular website. The website sends information to the browser, which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server. Find out more about the use of cookies on www.allaboutcookies.org.

When we talk about cookies in this Notice, this term also includes other similar technologies (such as device fingerprinting or web beacons).

b) The types of cookies we use

We use the following types of cookies on the Site:

| **Type of cookie** | **Purpose** | **Duration until expiry** |
|---|---|---|
| **[Essential]** | [These cookies are required to enable core functionality of the Site. Without these cookies, services you have asked for cannot be provided. If you disable these cookies, certain parts of the Site will not function for you.] | [Session] |

c) Session and persistent cookies

Cookies can be persistent or session cookies depending on the time that they remain on your device. A persistent cookie is stored on your device after your web browser is closed or once your session ends. It can be used to recognise your device when you open your browser and use the Site again. A session cookie exists temporarily on your device while your browser is open. It is deleted automatically once you leave the Site or close your browser.

**11. Data Security and Security Measures**

We are committed to protecting your privacy and treating your personal information confidentially. In order to avoid any manipulation, loss or misuse of your data stored by us, we take extensive technical and organisational security measures that are regularly reviewed and adapted to technological progress. Our security measures are continuously revised in line with technological developments. Our employees are obliged to maintain confidentiality. This includes, among other things, the use of recognised encryption methods (SSL or TLS).

However, we would like to point out that due to the structure of the internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions for which we are not responsible. In particular, unencrypted data - e.g. if this is done by e-mail - can be read by third parties. We have no technical influence on this. It is the responsibility of the user to protect the data provided by him against misuse by encryption or in any other way.

**12. Minors**

The Site, and the information provided on the Site, are not designed or intended for use by children of 16 years and younger. Where required, Lupin also do not knowingly collect, process or store any personal data from any users under the age of 16 without the verifiable consent of a parent or guardian prior to collecting, processing or storing information collected either directly or indirectly through the use of the Site. Parents or guardians of minors may have the right to request to view or delete personal data provided by the child either directly or indirectly through the use of the Site.

**13. Contact Information**

You can get in touch with us with any questions about this Notice, our data processing, or our use of

cookies in connection with the Site using the contact details here.

If you have questions or concerns about this Notice or the processing of your personal data, you may also contact our external Data Protection Officer at:

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

If you have any concerns, you have the right to complain to the Information Commissioner Office (www.ico.org.uk).

**14. Updates to this Privacy Notice**

Changes to the law or changes to our corporate processes may require an adaptation of this Notice and we refer you to this page to review and read this Notice regularly. The most current version of this Notice can be accessed on the Site any time under “Privacy Notice”, saved and printed out. This Notice was last updated as of the “Last Updated” date shown above.