

## PRIVACY POLICY

EFFECTIVE DATE: JANUARY 1, 2020

This privacy policy (the “Privacy Policy”) describes how Sun Pharmaceutical Industries Inc. (“Sun Pharma,” “we,” or “us”) collects, uses, maintains, and shares Personal Information including Personal Information gathered through the Ezallor™ Sprinkle website located at EzallorSprinkle.com (the “Website”), studies, products, and services (collectively with the Website, the “Services”).

This Privacy Policy is incorporated into, and is subject to, the Terms of Use. By visiting the Website or using the Services, you accept and consent to the collection, use, and disclosure of that Personal Information described in the Privacy Policy and Terms of Use.

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual or household. Aggregated or de-identified data is not considered Personal Information under the California Consumer Privacy Act of 2018 (“CCPA”).

### WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT?

The Personal Information we collect falls into two categories: (1) information you voluntarily supply us when you visit our Website or otherwise interact with us; when you submit your information, such as via a contact form or as part of a transaction; when we collect your information in connection with your participation in a clinical study; and when you otherwise use our Services and (2) tracking, usage, and other information gathered as you visit our Website.

**Personal Information You Provide.** We obtain certain Personal Information when you provide it to us. The following Personal Information about you may be collected when you interact with us or use our Website or Services:

- **Identifying and contact details:** Name, phone number, email, physical address, electronic signature, federal or state issued professional identification, date of birth, and demographic information (including age and gender).
- **Employment Information:** Job title, professional experience, education, performance history, training records, income, salary, and compensation.
- **Household Information:** Number of children and spouse.
- **Health Information:** Physical or psychological state of health, disease state, medical history, medical treatment or diagnosis, health care provider information, prescription information, genetic information, and health insurance identification or account information.

This information may be supplied by you in response to specific questions, when you sign up for communications from us, communicate with us in person or by email, participate in our clinical studies, or use our Services. You can always refuse to supply Personal Information in response to requests, except that it may prevent you from engaging in transactions, Website-related activities or receiving responses to your inquiries or other information of interest such as our patient support programs. Information that is optional at these collection points will generally be noted and marked as such.

**Passive Information.** Sun Pharma may use third party analytics tools, including Google Analytics, to help us measure traffic, and usage trends by your use of our Website. These tools use various technologies, including cookies or similar technologies, to collect certain information sent by your devices to the Website, including:

- Your browser name;
- Demographic data about you;
- The pages you visit on the Website;
- Your existing applications;
- Whether you have previously accessed the Website;
- The IP (Internet Protocol) address for your computer;
- Your mobile network information;
- Navigational data, also known as log files, server logs or clickstream data; and
- Anonymous IDs for advertising.

Note that these third-party service providers have their own privacy policies addressing how they use such information. To opt out of Google Analytics on the Website go to <https://tools.google.com/dlpage/gaoptout>.

## HOW DO WE USE PERSONAL INFORMATION?

We may use your Personal Information to respond to your contact inquiries, provide you with Services you have requested and/or customer support, communicate with you about Services that may be of interest to you, and develop and improve our Services.

Additionally, we analyze Personal Information to help us determine how users access parts of the Website and who our users are. We may use Personal Information to make our Website more interesting and useful to you; for analyzing and improving the value of the material available on our Website; to increase the effectiveness of the Services we will offer to you in the future; and to help our partners and service providers, or our Website design teams, to create, serve, and track promotions our customers might like.

We may use Personal Information we have collected to enforce our Terms of Use, prevent or respond to fraud, and fulfill legal obligations, such as responding to court orders, subpoenas, or government requests.

By using the Website or Services, or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy, and any administrative issues. If we learn of a security system's breach, we may attempt to notify

you electronically by posting a notice on the Website or sending an email to you. You may have a legal right to receive this notice in writing. If you have any questions or concerns, please notify us at [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com).

## HOW DO WE SHARE INFORMATION?

We share your Personal Information for the purposes described in this Privacy Policy, including:

- We may disclose to our service providers and other third parties who process your Personal Information to provide services to us or you including, without limitation, market research; fraud protection; data analysis; email management; and customer service. In some instances, these service providers and third parties may have access to Personal Information, but they are contractually obligated to maintain the confidentiality of the information and to use it only for purposes of carrying out the business of Sun Pharma. These service providers and other third parties can be classified in the following categories:
  - Distributors, which we use to deliver our products;
  - Marketing partners, which we use to send you promotional communications;
  - IT service providers, such as our data hosting provider and companies we employ to manage our Website and to provide Website-related services and/or to assist us in analyzing how our Website is used; and
  - Other service providers that we may engage to provide services to us or on our behalf.
- We may disclose to any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, in order to enforce our Terms of Use, or otherwise to protect our rights/property or the rights/property of any third party.
- We may disclose your Personal Information while negotiating or in relation to a change of corporate control, such as a restructuring or sale of assets.
- We may share Personal Information with third parties, including but not limited to advisors, advertisers, analytics providers, and investors, for the purpose of conducting our business.

We reserve the right to disclose to third parties non-Personal Information, such as aggregated or de-identified information, for any lawful purpose.

## SECURITY

Sun Pharma cares about the security and confidentiality of your Personal Information. We seek to maintain commercially reasonable administrative, technical, and physical security, collection, storage, and processing measures to protect against the unauthorized access, alteration, disclosure or destruction of the Personal Information you submit to us. However, no website is completely secure, error free, or “hacker proof.” You

are responsible for taking reasonable steps to protect your Personal Information against unauthorized disclosure or misuse. We cannot guarantee that your use of our Website or Services will be completely safe, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure. We are not responsible for third-party circumvention of any privacy settings or security measures.

## CHILDREN

We do not knowingly collect or store Personal Information from anyone under the age of 13 unless or except as permitted by law. ANY PERSON WHO VISITS ANY OF THE WEBSITE OR USES THE SERVICES REPRESENTS TO US THAT HE OR SHE IS 13 YEARS OF AGE OR OLDER. If we are made aware that we have received Personal Information from someone under 13, we will use reasonable efforts to remove that information from our records.

## COOKIES AND DO NOT TRACK

Sun Pharma uses cookies and similar technologies to collect information for the purposes outlined in this Privacy Policy. A cookie is a small data file that our server sends to your browser when you visit the Website. The use of cookies helps us to assist your use of certain aspects of the Website. You may be able to set your Internet browser to disable, turn the cookie feature off, or reject cookies entirely by changing the settings. Changing these settings, however, may affect your ability to use certain features and functions of the Website. Please note that by visiting the Website you are consenting to the use of cookies. For more information about third-party cookies, including information about how to opt out of these technologies, [click here](#).

The Website may also use other technologies including but not limited to JavaScript tags or tracking pixels to collect, process, and store browsing information as described above. Tracking pixels and tags assist in delivering cookies and allow us to collect browsing information about you. Tracking pixels or tags may also be included in the emails we send you in order to determine whether the emails have been opened and if you have clicked on links with the email.

The Website uses first party cookies (set by Sun Pharma) and third party cookies (set by web analytics partners). The cookies used on our Website may be persistent or session based. A session cookie is a piece of information that is enabled only during a particular Website session. Session cookie files are deleted after logging off the internet browser or powering off your computer. In contrast, a persistent cookie is not deleted after logging off an internet browser or powering off your computer, but “persists” between sessions. Both types of cookies provide statistical information as well as help make improvements in Website navigation.

At this time, we do not track our users’ Personal Information over time and across third-party websites. We therefore do not respond to browser Do Not Track signals. We do not knowingly permit third parties to collect Personal Information about an individual user’s online activities over time and across different websites when using our Website.

## PRIVACY RIGHTS

### Nevada Privacy Rights

We do not sell Personal Information for monetary consideration. Nevada residents have the right to submit a verified request directing us not to sell their Personal Information. If you are a Nevada resident, and would like to submit such a request, please send your request to [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com).

### California Privacy Rights

We will provide the right to request and receive, once a year and free of charge, information about third parties to whom we have disclosed certain types of personal information (if any) about you for their direct marketing purposes in the prior calendar year, and a description of the categories of Personal Information shared. To make such a request, please send an email to [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com) and please include the phrase "Personal Information Privacy Request" in the subject line, the domain name of the website you are inquiring about, along with your name, address and email address. At our option, we may respond to such requests by providing instructions about how our users can exercise their options to prevent our disclosure of personal information to third parties for their direct marketing purposes.

Under the CCPA, California consumers have the right to request:

- the deletion of the Personal Information we have about them;
- additional information about whether and how we have collected, used, disclosed, and sold Personal Information about them; and
- the specific pieces of Personal Information we have about them.

California consumers also have the right not to receive discriminatory treatment if they exercise the rights list above.

You may submit a privacy rights request to us by:

- Emailing us at [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com).

When you make a request, we may require that you provide information and follow procedures so that we can verify the request and your jurisdiction before responding to it. The verification steps we take may differ depending on the request you make. We will only use the information received in a request for the purposes of responding to the request.

California law permits California consumers to use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of the California consumer's written permission (for example, a power of attorney) that shows the authorized agent has the authority to submit a request for the California consumer. An authorized agent must follow the process described above to make a request. The

authorized agent must also verify his/her own identity. We will confirm the agent's authority with the California consumer about whom the request was made.

Note that certain information that is governed by the California Confidentiality of Medical Information Act (CMIA) or the Health Insurance Portability and Accountability Act of 1996, as amended and implemented (HIPAA), or is subject to the Federal Policy for the Protection of Human Subjects, also known as the Common Rule, pursuant to good clinical practice guidelines issued by the International Council for Harmonisation or pursuant to human subject protection requirements of the United States Food and Drug Administration, is not considered Personal Information with respect to the rights of California residents noted above. However, additional rights might be available under those laws and standards. Please contact [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com) for more information.

### **Updating Your Information**

To keep your Personal Information current and accurate, please contact us as specified above. If you decide to email us, please include the words "Updating Personal Information Update" in the subject line.

We will take reasonable steps to update or correct Personal Information in our possession that you have previously submitted via this Website.

### DATA RETENTION

Except to the extent prohibited by law, and subject to this Privacy Notice, we will retain your information for as long as needed to provide you with the Services, for Sun Pharma's valid business purposes, and as necessary to comply with our legal obligations, resolve disputes, defend our legal rights, and enforce our agreements.

Where we process Personal Information for marketing purposes or with your consent, we process the data until you make us aware by unsubscribing to future contact. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your Personal Information so that we can respect your request in the future.

Where we process Personal Information to meet legal requirements, we hold this for as long as the law requires (for example, we may hold records to help prevent fraud and other prohibited or illegal activities).

### NEW USES OF PERSONAL INFORMATION

From time to time, we may desire to use Personal Information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, we will make reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

## PRIVACY POLICY CHANGES

We may, in our sole discretion, change this Privacy Policy from time to time. Any and all changes to this Privacy Policy will be reflected here and the date new versions are posted will be stated at the top of this Privacy Policy. If we make material changes in how we use Personal Information, we will notify you by email if you have provided your email address to us or by means of a notice on this Website.

## LINKS TO THIRD-PARTY WEBSITES

Our Website may contain links to other third-party websites. This Privacy Policy does not apply to the practices of other websites, and Sun Pharma is not responsible for the actions and privacy policies of third parties. We encourage you to be aware of when you leave our Website and to read the privacy policies of each website that you visit.

## HOW DOES THIS POLICY APPLY OUTSIDE OF THE U.S.?

The information collected by Sun Pharma is hosted in the United States of America and is subject to U.S. state and federal law. If you are accessing the Website from other jurisdictions, please be advised that you are transferring your Personal Information to us in the United States where data protection and privacy laws may be less stringent than the laws of your country. BY USING OUR WEBSITE, YOU CONSENT TO THE TRANSFER AND USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

## CONTACT US

If you have any questions or comments regarding our Privacy Policy, please contact us at [US.Privacypolicy@sunpharma.com](mailto:US.Privacypolicy@sunpharma.com).