


	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>1 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

# Data Privacy Policy

	Granules India Limited	Data Privacy Policy		Page No. 2 of 16
	Dept.: Legal & IT	Document No:	Effective Date: May 12, 2025	

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Document Definition

The document outlines the policy for Data Privacy Policy of Granules India Limited and all its global affiliates.

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Signature: \_\_\_\_\_

Deep Sagar  
VP & Global Head - Legal

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>3 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	


**TABLE OF CONTENTS**

1.	DEFINITIONS.....	4
2.	INTRODUCTION. ....	6
3.	REFERENCES. ....	6
4.	SCOPE.....	6
5.	TYPES OF PRIVACY DATA COLLECTED. ....	7
6.	DATA COLLECTION METHODS. ....	7
7.	PURPOSE OF DATA COLLECTION.....	9
8.	DATA STORAGE AND SECURITY. ....	10
9.	DATA RETENTION. ....	10
10.	DATA SHARING AND THIRD-PARTY PROCESSING. ....	11
11.	COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS. ....	12
12.	SOCIAL MEDIA AND DIGITAL ENGAGEMENT. ....	12
13.	COOKIES AND WEBSITE USAGE.....	13
14.	USER RIGHTS AND GRIEVANCE MECHANISM.....	13
15.	DATA BREACH RESPONSE. ....	14
16.	POLICY REVIEW AND UPDATES.....	15
17.	NON-COMPLIANCE AND VIOLATIONS. ....	16
18.	EXCEPTION MANAGEMENT.....	16

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>4 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

## 1. DEFINITIONS.

TERM	EXPLANATION
<b>Access Controls</b>	Security measures implemented to make sure that only authorized personnel can access Privacy Data, based on the principle of least privilege.
<b>Consent</b>	Freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of their Privacy Data.
<b>Cookies</b>	Small pieces of data stored on a User's device by a website, used to track and store information about the User's interactions with the site.
<b>Cross-Border Data Transfer</b>	The transfer of Privacy Data to a country outside the jurisdiction in which it was originally collected, typically requiring additional safeguards to maintain data protection.
<b>Data</b>	means a representation of information, facts, concepts, opinions or instructions in a manner suitable for communication, interpretation or processing by human beings or by automated means.
<b>Data Breach</b>	means any unauthorised processing of Privacy Data or accidental disclosure, acquisition, sharing, use, alteration, destruction or loss of access to Privacy Data, that compromises the confidentiality, integrity or availability of Privacy Data.
<b>Data Controller (includes Data Fiduciary)</b>	<p>A Data Controller or Data Fiduciary means the person or organisation who, alone or in conjunction with other persons, determines the purpose and means of processing of Privacy Data. The purpose of processing data involves 'why the Privacy Data is being processed and the 'means of the processing involves 'how the data is processed.Privacy</p> <p>means an individual appointed by the Company who shall—</p> <ul style="list-style-type: none"> <li>(i) represent the Company</li> <li>(ii) be based in India</li> <li>(iii) be an individual responsible to the Board of Directors or similar governing body of the Company; and</li> <li>(iv) be the point of contact for the grievance redressal mechanism of the Company.</li> </ul>
<b>Data Privacy Officer</b>	<p>A Data Privacy officer means an individual appointed by the Company who shall —</p> <ul style="list-style-type: none"> <li>(i) represent the Company;</li> <li>(ii) be an individual responsible to the Board of Directors or similar governing body of the Company; and</li> </ul>

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>5 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

TERM	EXPLANATION
	(iii) be the point of contact for the grievance redressal mechanism of the Company
<b>Data Processing Agreement (DPA)</b>	A legally binding contract between a Data Controller and a Data Processor, outlining the responsibilities and obligations of both parties regarding the handling of Privacy Data.
<b>Data Processing</b>	Any operation or set of operations performed on Privacy Data, whether by automated means or not, including collection, recording, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, dissemination, or otherwise making available, alignment, combination, restriction, erasure, or destruction.
<b>Data Processor</b>	A person or organisation who processes data on behalf of the Data Controller.
<b>Data Retention</b>	The policies and procedures for determining how long Privacy Data is kept by the Organization before being securely disposed of, anonymized, or archived.
<b>Data Subject (includes Data Principal)</b>	A Data subject or Data Principal is the identified individual or identifiable natural person the Privacy Data relates and where such individual is— <ul style="list-style-type: none"> <li>o a child, includes the parents or lawful guardian of such a child.</li> <li>o a person with disability, includes her lawful guardian, acting on her behalf.</li> </ul>
<b>Encryption</b>	The process of encoding Privacy Data to protect it from unauthorized access or alterations, both when stored (at rest) and when transmitted (in transit).
<b>Grievance Mechanism</b>	A structured process by which Data Subjects can raise concerns or complaints about the handling of their Privacy Data and seek resolution.
<b>Identifiable Natural Person</b>	An Identifiable Natural Person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
<b>Privacy Data (includes Privacy Data)</b>	means any information which is in the nature of Privacy Information and Sensitive Privacy Information and relating to an identified or identifiable natural person.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>6 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

TERM	EXPLANATION
<b>Privacy Information:</b>	Any information relating to an identified or identifiable natural person, an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or credit card number, email address, name, etc. It does not include de-identified Privacy Data.
<b>Sensitive Privacy Data</b>	It includes Privacy Data revealing economic or cultural or racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation or social identity of that natural person.
<b>Third-Party Processor</b>	An external entity that processes Privacy Data on behalf of the Organization, under a Data Processing Agreement or other agreement to comply with data protection standards.
<b>User Rights</b>	The rights afforded to individuals under data protection laws, including the right to access, rectify, erase, restrict processing, object to processing, and data portability.

2. INTRODUCTION.

Granules India Limited, including its global affiliates and subsidiaries (hereinafter referred to as “Granules” or “We” or “Us” or “Company”) is committed to safeguarding the privacy of Privacy Data entrusted to Us. This Internal Privacy Policy outlines our approach to collecting, processing, storing, and protecting Privacy Data in compliance with relevant laws and regulations across our operations in India, Europe, and the United States. This global policy ensures a consistent and comprehensive approach to data protection across all legal entities within our corporate group.

3. REFERENCES.

This Privacy Policy is developed based on Generally Accepted Privacy Principles (GAPP) and aligns with industry best practices. It reflects our commitment to transparency, accountability, and the protection of individual rights. We continuously review and update this Data Privacy Policy to maintain the highest standards of data protection, incorporating the latest legal requirements and industry advancements.

4. SCOPE.

This Data Privacy Policy (“Policy”) applies to Granules’ global employees and representatives of businesses and organizations Granules interacts with (e.g., vendors, suppliers, healthcare professionals, customers etc.) officers, staff members, Visitors to Granules’ website and other directly linked website or apps, members of the public who interact with Granules, Employees and contractors (including permanent, fixed term, temporary staff, any third-party

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>7 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

representatives and contractors, agency workers, volunteers, interns, and agents engaged with Granules). It governs the handling of Privacy Data in both online and offline environments, ensuring that our practices align with legal requirements and industry standards. For the purposes of this Policy, all the aforementioned stakeholders will collectively be referred to as **"Users."**

If you disagree with our Policy, please contact us at the address, or Telephone or Fax or Email provided in this Policy requesting that we cease processing your Privacy information. We will take appropriate action, but please note that this may affect our ability to provide you with the requested information, goods, or services. Our website may contain links to external sites beyond our control. The Company is not responsible for the privacy practices of these external website. Our website is not intended for children. We do not knowingly collect or process Data relating to children.

**5. TYPES OF PRIVACY DATA COLLECTED.**

We collect a diverse range of Privacy Data, reflecting the various interactions We have with individuals across our business operations. The types of Privacy Data collected include, but are not limited to:

**Government-Issued Identifiers:** This includes sensitive identification numbers such as Permanent Account Numbers (PAN) in India, Aadhar details, Social Security Numbers (SSN) in the United States, and other similar identifiers required by local regulations. These are essential for compliance with financial, tax, and other regulatory obligations.

**Personal Identifiers:** We collect basic Privacy information such as full names, dates of birth, email addresses, and phone numbers. This data is crucial for managing relationships with our Users, as well as for verifying identities in various contexts.

**Sensitive and Biometric Data:** In certain cases, We may collect sensitive information, including health-related data, which is integral for providing health insurance benefits to our employees. Biometric data, such as fingerprints or facial recognition data, may be collected for attendance tracking and security purposes, particularly in controlling access to secure areas and systems.


**Digital and Visual Data:** Photographs and other visual data may be collected for identification, security, marketing, presentations, uses on social media and other purposes. Additionally, data generated through digital interactions, such as IP addresses, device information, and user activity on our websites is collected to enhance User experience.

This variety of data enables Us to effectively operate our business, maintain compliance with legal obligations, and deliver personalized services.

**6. LEGAL BASIS FOR PROCESSING YOUR PRIVACY DATA**

We will only use your Privacy Data when the law permits us to do so.

We must have a valid basis for using your Privacy Data and we may not collect, store or use information shared via our website other than as described in the privacy notice. Following is the legal basis on which we may process your Privacy Data:

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>8 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

- **Fulfilling a contract:** The information we collect from you may be necessary to allow us to fulfil our contract with you or to enter in a contract with you.
- **Consent:** You may provide your consent for us to contact you or to collect your information. If you have given consent to our use of your Privacy information, you are entitled to withdraw this consent at any time by contacting Data Privacy Officer at the address, or Telephone or Fax or Email provided in Clause 16 of this Policy.
- **Legitimate interest:** We may also have a legitimate interest in using your Privacy Data to enable us to give you the best service/product and the best and most secure experience. If this is our reason for using your Privacy Data, we must make sure that our interests do not override yours and you can object to this use of your Privacy Data.
- **Legal obligation:** Lastly, we may have a legal obligation to use your Privacy Data in certain ways or to protect your interests under the various laws of the land where we operate, for example we may exchange information with other companies and organisations for the purposes of fraud protection and credit risk reduction or to monitor adverse effects of marketed products.

## 7. DATA COLLECTION METHODS.

Privacy Data is collected through multiple channels, including online platforms and offline methods (such as paper forms and direct interactions). We conduct data collection transparently and in accordance with applicable Consent requirements.

At Granules We employ a variety of data collection methods tailored to our business needs and regulatory obligations. These methods are designed to capture the necessary Privacy Data while respecting individual privacy and being compliant with applicable laws. Our data collection methods include the following:

**Websites and Mobile Applications:** Privacy Data is collected when Users interact with our websites and mobile applications. This includes data entered into forms, such as registration forms, contact forms, and surveys. We also collect data related to user behaviour on our websites, including pages visited, time spent on each page, and actions taken (e.g., downloads, clicks), using Cookies and similar tracking technologies.

**Email and Digital Communication:** Privacy Data is collected through email interactions, digital communication platforms and social media. For instance, when individuals subscribe to our newsletters, request information, or participate in webinars, We collect their email addresses and any other information they choose to share. These communications may be tracked to analyse engagement and improve our services.

**Paper Forms and Documents:** We collect Privacy Data through paper forms and documents in various contexts, such as job applications and customer feedback surveys. These forms are often used in face-to-face interactions at our offices, research facilities, or during events.

**In-Person Interactions:** Privacy Data is often collected during direct interactions with our Users whether in a healthcare setting, at trade shows, during business meetings or during discussions with doctors and medical representatives. This includes exchanging contact details, discussing personal preferences, or obtaining Consent for participation in research activities.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>9 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

**Partner Organizations:** We collaborate with healthcare providers, research institutions, and other partner Organizations that collect Privacy Data as part of joint initiatives. These partners are contractually bound to adhere to our data protection standards and to collect data in a manner that is compliant with applicable laws.

**Outsourced Services:** Certain services, such as customer support, IT management, and Data Processing, are outsourced to third-party vendors who collect and handle Privacy Data on our behalf.

By utilizing these diverse and comprehensive data collection methods, Granules ensures that Privacy Data is collected in a manner that is both effective and compliant with the highest standards of privacy and data protection.

**8. PURPOSE OF DATA COLLECTION.**

We use different methods to collect data from and about you including through automated technologies or interactions.

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this Privacy Data by using cookies and similar technologies. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive, and they are used to record how you navigate this website on each visit. Please see our Cookie Policy for further information.

The Privacy Data We collect serves several vital functions within our Organization, all of which are aligned with our business objectives and legal obligations:

**Internal Administrative Functions:** We use Privacy Data to manage our internal operations, including human resources activities such as recruitment, payroll, benefits administration, and employee performance management. Additionally, Privacy Data is essential for financial reporting, compliance with tax laws, and maintaining accurate records.

**Research and Development:** As a pharmaceutical company, research and development are at the core of our business. We use health-related data, among other Privacy Data, to conduct clinical trials, develop new products, and improve existing ones. This data is often collected from participants with their explicit Consent and under strict ethical guidelines to protect their rights and safety.

**Marketing and Communication:** Privacy Data enables Us to engage with our Users through targeted marketing efforts. This includes sending promotional materials, newsletters, and updates about our products and services. We make sure that marketing communications are relevant to the recipients and that they have the option to opt out of such communications at any time.

**Compliance and Legal Obligations:** We collect certain Privacy Data to comply with legal requirements, such as Know Your Customer (KYC) regulations, anti-money laundering laws, and other industry-specific legal obligations. This allows Us to operate within the legal frameworks of the jurisdictions in which We do business.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>10 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

We make sure that Privacy Data is processed only for legitimate business purposes and that Data Subjects are informed of the intended use of their information at the point of collection. Additionally, We regularly review our Data Processing activities to confirm they remain aligned with the purposes for which the data was originally collected.

**9. DATA STORAGE AND SECURITY.**

The security of Privacy Data is of paramount importance to Granules. We have implemented a comprehensive data storage and security framework designed to protect the confidentiality, integrity, and availability of Privacy Data across all our operations:

**Data Storage Locations:** Privacy Data is stored in both on-premises data centers and cloud environments, depending on the nature of the data and the operational needs. On-premises storage is used for certain data and in regions where local laws require data to be stored within the country. Cloud storage is used for its scalability, accessibility, and resilience, particularly for data that needs to be accessed by multiple offices or teams across different regions.

**Data Protection:** All Privacy Data is protected both at rest and in transit using appropriate measures. Protection at rest involves securing data stored in databases, files, and backup systems with Encryption and other safeguards to maintain its security even if the storage medium is compromised. Protection in transit includes using Encryption, password protection, and secure transmission protocols to safeguard data as it moves across networks, ensuring that it cannot be intercepted or tampered with during transmission.

**Access Controls:** We have implemented Access Controls to restrict access to Privacy Data to authorized personnel only. Access is granted based on the principle of least privilege, meaning that Users are granted the minimum level of access necessary to perform their duties. Access logs are maintained and regularly reviewed to detect and respond to unauthorized access attempts.

**Security Audits and Assessments:** Regular security audits and assessments are conducted to identify vulnerabilities in our systems and processes. These audits include both internal assessments and third-party penetration testing. We also conduct regular reviews of our security policies and procedures to be effective and up to date with the latest security threats and industry best practices.

Privacy Data stored within and outside the EEA is protected through GDPR-compliant mechanisms such as Standard Contractual Clauses (SCCs). We implement security measures in accordance with GDPR Article 32, the Virginia Consumer Data Protection Act (VCDPA), and New Jersey Data Protection Act to safeguard Privacy Data against unauthorized access and breaches.

**10. DATA RETENTION.**

We are committed to retaining Privacy Data only for as long as it is necessary to fulfil the purposes for which it was collected, in compliance with applicable legal and regulatory requirements. We will only retain your Privacy Data for as long as necessary to fulfil the purposes we collected it for, including the fulfilment of the contract, the initiation of a contract, or for the purposes of

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>11 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

satisfying any legal, accounting, or other regulatory reporting requirements. Data no longer needed is securely deleted or anonymized.

Our Data Retention practices are guided by the following principles:

**Purpose-Driven Retention:** Privacy Data is retained only for as long as it serves a legitimate business purpose or is required by law. For instance, employee data may be retained for the duration of employment and for a specified period afterward, as required by labour laws and tax regulations.

**Legal Compliance:** We adhere to statutory retention periods as prescribed by laws in the jurisdictions where We operates. For example, in India, certain financial and tax records must be retained for a specific number of years. Similarly, health-related data may be subject to longer retention periods under medical regulations.

**Regular Review:** We conduct regular reviews of the Privacy Data We holds to confirm that it is still required for the purposes for which it was collected. Data that is no longer needed is securely deleted, anonymized, or archived in compliance with our Data Retention policies.

**Secure Disposal:** When Privacy Data is no longer required, We dispose of securely to prevent unauthorized access or misuse. This may involve securely shredding physical documents, wiping electronic storage devices, or using certified data destruction services for digital records. The Company shall dispose of Privacy Data using a secure destruction mechanism only.

Our Data Retention process is designed to balance the need to retain data for business and legal purposes with the rights of individuals to have their Privacy Data deleted when it is no longer necessary. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the Privacy Data, the potential risk of harm from unauthorized use or disclosure of your Privacy Data, the purposes for which we process your Privacy Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

**11. DATA SHARING AND THIRD-PARTY PROCESSING.**

To efficiently manage our global operations and deliver our services, We may need to share Privacy Data with third parties. Our approach to data sharing and third-party processing is guided by strict controls and oversight:

**Data Sharing with Third Parties:** We may share Privacy Data with selected third-party service providers who assist Us in various aspects of our operations, such as IT services, cloud hosting, marketing, and payroll services. Such third-party vendors may process Privacy Data on the Company’s behalf as necessary, in connection with providing the Company’s products and services, fulfilling contractual arrangements and legal or regulatory requirements. Before engaging any third-party provider, We conduct a due diligence process to assess their data protection practices and verify that they have the ability to meet our stringent requirements. The Company requires that the third-party vendors protect your Privacy Data, only process it for the purposes it was shared for and not disclose it further.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>12 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

**Data Sharing with Group Companies:** In some cases, Privacy Data may be shared with affiliated companies within our corporate group to support joint business activities, such as product development, marketing campaigns, or centralized administrative functions. Data shared within the group is subject to the same level of protection as data handled directly by Granules.

**Data Processing Agreements:** Where required, third-party service providers with whom We share Privacy Data are required to enter into Data Processing Agreements (DPAs). These agreements outline the responsibilities of each party, including obligations related to data protection, confidentiality, and security. DPAs also specify the purposes for which the data can be processed and the conditions under which it can be shared with sub-processors. If a confidentiality agreement is in place with a third party, its terms will take precedence over the requirements set out in this Privacy Policy.

**Cross-Border Data Transfers:** Given our global operations, Privacy Data may be transferred across borders to jurisdictions where our offices, partners, or service providers are located. We confirm that all Cross-Border Data Transfers comply with applicable data protection laws, including the use of appropriate safeguards such as Standard Contractual Clauses (SCCs) or Binding Corporate Rules (BCRs) where required by law.

**Data Sharing with Law Enforcement and Government Authorities:** We may share your Privacy Data with law enforcement or government authorities where they have followed due legal process to request the Company to disclose the information

**Monitoring and Compliance:** We actively monitor our third-party service providers to verify ongoing compliance with our data protection standards. This includes regular audits, assessments, and reviews of their data handling practices. In the event of any breach or non-compliance, We take immediate action to address the issue and, if necessary, terminate the relationship with the third party.

**12. COMPLIANCE WITH LEGAL AND REGULATORY REQUIREMENTS.**

Granules adhere to the data protection laws applicable in the regions where We operate, including but not limited to the data privacy laws of India, USA and Europe.

We regularly review and update our practices to confirm ongoing compliance with these legal frameworks of the regions.

**13. SOCIAL MEDIA AND DIGITAL ENGAGEMENT.**

Social media plays a key role in our communication strategy, allowing Us to engage with a broad audience, including customers, partners, and the general public. However, We recognize the importance of handling Privacy Data responsibly in these digital spaces:

**Social Media Usage:** Employees engaging on social media platforms on behalf of Granules must do so responsibly, ensuring that no Privacy Data is shared without proper authorization. This includes avoiding the sharing of sensitive information, such as health data or government-issued identifiers, unless explicit Consent has been obtained or it is necessary for legitimate business purposes.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>13 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

**Compliance with Policies:** All digital interactions, including those on social media, must comply with our internal social media policy, which outlines the guidelines for appropriate use of social media in a business context. This Privacy Policy is designed to protect both the company's reputation and the privacy of individuals who interact with Us online.

**Third-Party Platforms:** When We use third-party platforms for social media engagement, We verify that these platforms comply with applicable data protection laws. We also inform Users about how their data will be used, and We provide options for managing privacy settings and preferences.

**Monitoring and Response:** We monitor our social media channels for any potential privacy issues, such as the unauthorized sharing of Privacy Data or breaches of our social media policy. If a privacy issue is identified, We take immediate action to rectify the situation and prevent further incidents.

By adhering to these guidelines, We conduct our social media activities in a manner that respects the privacy and rights of all individuals involved.

**14. COOKIES AND WEBSITE USAGE.**

Our websites use Cookies and similar technologies to enhance user experience and analyse traffic. We inform visitors about our use of Cookies through a clear notice and provide options to manage Cookie preferences. Users can opt-out of non-essential Cookies in accordance with our Cookie management policy.

**15. USER RIGHTS AND GRIEVANCE MECHANISM.**


We recognize the rights of individuals to control their Privacy Data and provide mechanisms for them to exercise these rights. Our approach to User Rights and grievances includes the following:

**Right to Access:** Individuals have the right to request access to the Privacy Data We hold about them. This includes the right to obtain a copy of the data, understand how it is being used, and verify its accuracy. Requests for access will be responded to within the timeframe specified by applicable law ensuring transparency and openness in our data practices.

**Right to Correction:** If any Privacy Data We hold is inaccurate or incomplete, individuals have the right to request corrections. We will promptly correct any inaccuracies upon verification of the request.

**Right to Deletion:** In certain circumstances, individuals have the right to request the deletion of their Privacy Data. This right applies when the data is no longer necessary for the purposes for which it was collected, the individual withdraws Consent, or the data has been unlawfully processed. We will assess each deletion request in accordance with legal requirements and, where applicable, delete the data securely.

**Right to Restrict Processing:** Individuals have the right to request the restriction of Data Processing in certain circumstances, such as when they contest the accuracy of the data or when the processing is unlawful, but the individual opposes deletion. We honour such requests by temporarily limiting the use of the data while We address the issue.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>14 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

**Right to Data Portability:** Under GDPR, individuals have the right to request a copy of their Privacy Data in a structured, commonly used, and machine-readable format. This right applies to data that has been provided to Us by the individual and is processed based on Consent or for the performance of a contract. We facilitate the transfer of this data to another service provider if requested by the individual.

**Right to Object:** Individuals have the right to object to certain types of Data Processing, such as processing for direct marketing purposes. We will respect objections unless We can demonstrate compelling legitimate grounds for the processing that override the individual's interests, rights, and freedoms.

**Grievance Mechanism:** We are committed to addressing any concerns or grievances related to our Data Processing practices. Individuals can raise grievances by contacting our designated grievance officer via email at [GrievanceOfficer@GranulesIndia.Com](mailto:GrievanceOfficer@GranulesIndia.Com). We have established a clear process for handling grievances, which includes logging the complaint, conducting a thorough investigation, and providing a response within a reasonable timeframe. If the grievance is not resolved to the individual's satisfaction, they have the right to escalate the matter to the relevant data protection authority.

**Transparent Communication:** We inform individuals of their rights and the procedures for exercising them through clear and accessible communication channels. This includes providing detailed information on our website, in privacy notices, and in responses to inquiries.

By empowering individuals to exercise their rights and providing a transparent Grievance Mechanism, We reinforce our commitment to ethical data handling and build trust with our stakeholders.


## 16. DATA BREACH RESPONSE.

In the event of a Data Breach, Granules is committed to taking immediate and effective action to mitigate the impact and comply with legal obligations:

**Notification to Authorities:** If a breach involving Privacy Data occurs, We will promptly notify the relevant regulatory authority of the country where the Company operates, as mandated under the applicable laws. In the case of a breach that poses a high risk to individuals' rights and freedoms, We will notify the affected individuals without undue delay.

**Containment and Mitigation:** We take immediate steps to contain the breach, prevent further data loss, and mitigate the potential impact on individuals. This may involve isolating affected systems, resetting access credentials, or implementing additional security measures.

**Investigation and Analysis:** We conduct a thorough investigation to determine the cause of the breach, the extent of the data loss, and the potential impact on individuals. The findings of the investigation inform our response and any corrective actions needed to prevent future breaches. Complaints are reviewed and investigated and a report of the same is provided to the Advisory Committee (“**Committee**”). The investigation shall be completed within 72 hours of receipt of the complaint. Actions of the violations (if any) should be determined by the Committee.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>15 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

**Communication and Support:** We communicate transparently with affected individuals, providing them with information about the breach, the steps We have taken to mitigate the impact, and any actions they can take to protect themselves. We also offer support to help individuals navigate the situation and minimize any harm.

Our breach response plan is regularly reviewed and updated to maintain its effectiveness in addressing emerging threats and complying with legal requirements.

## 17. CONTACT US

If you have any questions or concerns about this Privacy Statement or how We handle your Privacy Data, please contact Us at [GrievanceOfficer@GranulesIndia.com](mailto:GrievanceOfficer@GranulesIndia.com) or at +91-40-69043711. Should you have any questions about our Policy and practices, or if you have any concern, feel free to contact our Data Privacy Officer at the address, or Telephone or Fax or Email provided in Clause 17 of this Policy.

We shall not be responsible for any communication, if addressed, to any non-designated person in this regard.

If you have any queries or complaints about our compliance with this Policy or you believe that any Privacy Data, we have about you is incorrect, has been, or might be used inappropriately or there is a Data Privacy Breach, please directly complain to our Data Privacy Officer or anonymously through our whistleblower reporting mechanism.

Our Data Privacy Officer may be also reached at:

### **Data Privacy Officer**

Granules India Limited  
15<sup>th</sup> Floor, Granules Tower, Botanical Garden Road, Kondapur,  
Hyderabad - 500084, Telangana.


The Company shall put in reasonable efforts to effectively and efficiently provide redressal for any grievances raised under this Policy.

## 18. POLICY REVIEW AND UPDATES.

Granules is committed to continuously improving our data protection practices. We regularly review and update this Policy to reflect changes in legal requirements, industry standards, and technological advancements. Employee training programs are conducted to make sure that our staff is aware of and complies with this Policy and is equipped to handle Privacy Data responsibly.

This Policy shall be reviewed every 2 years to ensure that it remains relevant to the current needs of the Company and legislative changes in the jurisdictions where the Company operates.

The Policy may be amended at any time, if required.

	<b>Granules India Limited</b>	<b>Data Privacy Policy</b>		<b>Page No.</b> <b>16 of 16</b>
	<b>Dept.: Legal &amp; IT</b>	<b>Document No:</b>	<b>Effective Date:</b> May 12, 2025	

The Company reserves the right to add, revise, amend, modify or delete any part of this Policy (in part or in full) at its discretion. The updated version of this Policy in force will be posted on the Company's Website from time to time. In the event of any change in the applicable law, this Policy shall be deemed to be amended or modified to the extent necessary to comply with such amendment or to meet any requirement under the applicable laws.

#### **19. NON-COMPLIANCE AND VIOLATIONS.**

Violation of this Privacy Policy may result in disciplinary action up to and including termination of employment and / or legal action.

#### **20. EXCEPTION MANAGEMENT.**

If a department or function is unable to comply with any requirements detailed within this Privacy Policy, an exception shall be obtained. Such exceptions shall be documented, indicating the rationale for the exception and the related risks. Exceptions to this Privacy Policy shall follow the exception management process for prior authorization and approval.