

Privacy Policy

1. **Introduction:** Zydus Wellness Limited (“Zydus Wellness”) welcomes you to its Online Platform and values the opportunity to engage with you. We respect your fundamental right to privacy and are committed to safeguarding your personal information in accordance with the Digital Personal Data Protection Act, 2023 and other applicable Indian laws. This Privacy Policy sets out our practices relating to the collection, use, processing, storage, transfer, and disclosure of personal information, and explains the measures we adopt to ensure confidentiality and compliance with legal standards. By choosing to share your personal information with us, you acknowledge and consent to the terms of this Privacy Policy. Our data handling practices are subject to continuous review to ensure that your privacy is protected and that our operations remain compliant with applicable laws and regulations.
2. **Definitions:**
 - i.) “Affiliates” shall mean a) Any entity that directly or indirectly controls, is controlled by, or is under common control with Zydus Wellness Limited b) “Control” shall mean the ownership of more than fifty percent (50%) of the voting rights or equity interests in such entity, or the ability to otherwise direct the management and policies of such entity, whether through ownership, contract, or otherwise. c) Affiliates shall include Zydus Wellness group companies, subsidiaries, joint ventures, and associate companies engaged in business activities aligned with or supportive of Zydus Wellness Limited.
 - ii.) Online Platform shall mean website; web-based Online platforms and / or mobile application.
 - iii.) “Personal Information” means any data about an individual who is identifiable by or in relation to such data, either directly or indirectly, including following:
 - a) Identity and Contact Data: Name, email address, phone number, postal/shipping address, country.
 - b) Demographic Data: Age, gender, and other personal attributes.
 - c) Online Identifiers and Technical Data: IP address, device identifiers, location data, browser information, and logs.
 - d) Communication Metadata: Information contained in or derived from emails, SMS, instant messages, and calls.
 - e) Usage Data: Information about how you interact with our Online platform, including pages viewed, preferences, and activity history.
 - f) Cookies and Tracking Data: Information collected through cookies and similar technologies.
 - iv.) Sensitive Personal Information shall be as defined under applicable law and may include financial information, health data, biometric identifiers, or any other category designated by law. Such data will be processed only with explicit consent and in strict compliance with the DPDP Act.
 - v.) ‘you’ or ‘your’ or ‘Visitor’ or “Consumer” or “Customer” shall mean user accessing Online Platform.
 - vi.) “we”, “us”, “our”, “ours”, “Zydus Wellness” shall mean Zydus Wellness Limited and its affiliates including Zydus Wellness Products Limited and others.
 - vii.) All words and expressions used herein and not defined, but defined in the Information Technology Act, 2000 and/or the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 shall have the meanings respectively assigned to them thereunder.
3. **Scope and Applicability:** This Policy applies to all personal data in digital form processed by us, whether collected directly from you or generated through your interaction with our Online platform. Our product and/or services are offered only within India. If you access the Online platform from outside India, please note that we do not provide products or services outside India. This Policy is governed by the laws of India, including the DPDP Act, 2023 and its applicable rules, as may be amended from time to time.

4. **Notice:** Zydus Wellness Limited (“Zydus Wellness”) shall provide clear and timely notice to individuals regarding the collection, use, processing, storage, transfer, and disclosure of their personal information. Such notice shall be presented at or before the time of data collection and shall specify the categories of personal information being collected, the purposes of processing, the lawful bases relied upon, and the rights available to the individual under the Digital Personal Data Protection Act, 2023 and other applicable laws. Notices shall be drafted in clear and plain language, accessible through the Online Platform, and shall inform individuals of any material changes to this Privacy Policy or to our data handling practices. Where required by law, we shall seek renewed consent prior to implementing such changes. In the event of a personal data breach or any incident affecting the confidentiality, integrity, or availability of personal information, we shall provide notice to affected individuals and to the Data Protection Board of India, in accordance with applicable legal requirements.
5. **Consent:** By accessing or using the Online Platform, or by voluntarily providing your personal information, you expressly consent to the collection, storage, processing, transfer, use, and disclosure of such information (including sensitive personal information, where applicable) in accordance with this Privacy Policy and applicable law. If you do not agree with these terms, you should refrain from using or accessing the Online Platform.

Consent shall be obtained in clear and plain language, specifying the purpose of processing, and shall be limited to what is necessary for the provision of services. You may review the status of your consent through the Online Platform, and you retain the right to withdraw consent at any time by contacting us or our Grievance Officer. Upon withdrawal, processing of your personal data for the specified purpose shall cease, unless otherwise required by law, and the consequences of such withdrawal shall be communicated to you prior to implementation.

If you are below the age of eighteen (18) years, consent must be provided by your parents or lawful guardian. We do not knowingly collect personal information from minors without appropriate parental or guardian consent.

You shall have access to your personal information stored on the Online Platform and may review, update, or correct such information at any time. You are solely responsible for ensuring the accuracy and completeness of the data you provide, and we shall not be liable for any consequences arising from inaccurate or incomplete information. In accordance with the DPDP Act, you also have the right to nominate another individual to exercise your rights under this Privacy Policy in the event of your incapacity or death, provided such nomination is communicated to us in writing.

6. **Purpose of collection of Personal Information:** The information we collect from you, personal or otherwise, is used to register you, verify your identity, to permit You to use the Online platform, undertake transactions, communicate with you via phone, email, or chat, use it for recording purchase and delivery of products and services; convey any promotional offers, displaying interest-based advertising services or updates associated with us. We also use this information to customize your experience and improve the Online platform.
7. **Use and Storage of Personal Information:** We shall securely store all personal information provided by you while using the Online Platform or through any other means. You may choose not to provide certain information; however, this may limit your ability to access or use certain features of the Online Platform. The personal information you provide shall be used for purposes including, but not limited to, opening and maintaining your account, processing transactions, responding to your requests, and communicating with you. We may also collect and store information automatically whenever you interact with us, including using cookies, device identifiers, location data, and browser information. Such information may be used for internal analysis, to provide location-based services, and to deliver personalized content such as advertising and search results.

Cookies used on the Online Platform may include:

- a) **Strictly Necessary Cookies:** Required to operate the Online Platform, ensure security, and comply with applicable regulations.

- b) **Functional Cookies:** Used to remember your preferences, such as language, region, or accessibility settings.
- c) **Performance Cookies:** Used to analyse usage patterns and improve the performance and quality of our services.
- d) **Targeting or Advertising Cookies:** These cookies are used to deliver content that is more relevant to you and your interests. They are also used to deliver targeted advertising or limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns on Zydus Wellness and on other websites

Most web browsers allow you to manage cookies through settings; however, disabling strictly necessary cookies may render certain parts of the Online Platform inaccessible. Additional tracking mechanisms may also be used in compliance with applicable laws. Please refer to our Cookie Policy on details around how we collect and process your personal data.

Lawful Bases of Processing: We process personal information in accordance with applicable laws and regulations, relying on one or more of the following lawful bases:

- a) Your explicit consent for specific purposes.
- b) Processing necessary for the performance of an agreement with you.
- c) Processing necessary to comply with legal obligations.
- d) Processing necessary to evaluate, develop, or improve our products and services.

Where processing is based on consent, you retain the right to withdraw such consent at any time by contacting us. Upon receipt of a withdrawal request, we shall inform you of the consequences, and subject to your agreement, process the withdrawal in accordance with law.

- 8. **Promotions, Offers, and Schemes:** This Privacy Policy shall apply to all personal data and information collected, processed, or otherwise dealt with by Zydus Wellness during any promotional activities, special offers, discounts, loyalty programs, contests, or scheme rollouts conducted through the Application or any other authorized platform. All such data shall be collected, stored, processed, used, and disclosed strictly in accordance with the terms set out in this Privacy Policy and the applicable provisions of the Digital Personal Data Protection Act 2023 and other relevant laws. Consumers participating in such promotions or schemes shall be deemed to have consented to the collection and use of their personal information for the specific purposes of administering, fulfilling, and communicating such promotional activities, subject always to their rights under applicable law.
- 9. **Disclosure and Transfer:** We may disclose your personal data to our group companies, affiliates, subcontractors, agents, and service providers who perform functions or provide services on our behalf. All such parties are bound by contractual obligations to process personal data only in accordance with our instructions, to maintain its confidentiality, and to retain it only for the period specified in such contracts. We may also disclose personal data to governmental authorities, regulatory agencies, or other entities if required to comply with applicable law, legal process, or to protect the safety, security, and rights of individuals or our business. Personal data may be transferred to servers or third parties located outside your country of residence for the purposes described in this Privacy Policy. You acknowledge and accept that such countries may have different, and potentially less stringent, data protection laws. In such cases, we shall use best endeavors to implement appropriate safeguards to ensure that your personal data is processed fairly, lawfully, and securely, and is retained only for as long as necessary.
- 10. **Cross Border Data Transfer:** Whenever we transfer personal data to countries outside India, we are legally obliged to ensure that the data is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on Data Protection. We are legally obliged to adhere to Government of India's decisions on restriction of transfer of Personal Data to blacklisted countries and / or to use contracts with standard safeguards and similar measures under applicable Data Protection laws for such transfers as may be notified by the Central Government.

11. **Data Security Measures and Standards:** We have implemented and maintained reasonable security safeguards and technical, operational, and organizational measures to protect personal data against unauthorized access, disclosure, alteration, or destruction, in strict compliance with the Digital Personal Data Protection Act, 2023 and applicable rules. Such measures include encryption, access controls, secure storage, audit trails, and regular monitoring of systems to ensure integrity and confidentiality of personal data. We shall adopt security practices and procedures consistent with industry standards and as prescribed under applicable law. All employees, agents, and third-party service providers handling personal data on our behalf shall be contractually bound to adhere to these security obligations. In the event of a personal data breach, we shall take all reasonable steps to contain and remedy the breach, notify the Data Protection Board of India and affected individuals, and cooperate with regulatory authorities in accordance with the law.
12. **Data Retention and Disposal:** We shall retain personal data (a) until the completion of the specific purpose for which such data was collected; and /or as per timelines mentioned in the Notice for Consent (b) until the account closure; or (c) for such longer duration as may be mandated under applicable law or for audit and compliance purposes, whichever is later. Confidentiality of the personal information will be maintained, and access will be limited to authorized personnel only. Personal information collected about you will be stored on our systems or with third-party servers engaged by us, for as long as it is required to fulfil the purposes set out in this Privacy Policy and for legal or regulatory compliance. Upon expiry of the applicable retention timelines, we shall take all reasonable steps to notify you and delete or permanently de-identify such personal information, unless retention is otherwise required under applicable law. Confidentiality shall be always maintained, and access shall be restricted to authorized personnel only.
13. **Links to other Websites/ Online platforms:** Our Online platform may contain links to websites of other organisations. This privacy policy does not cover how that organisation processes personal data. We encourage you to read the privacy policies on the other websites/ Online platforms you visit.
14. **Rights under the DPDP Act:** You have the following rights:
 - a) Right to Access: Know what personal data we process.
 - b) Right to Correction: Request correction of inaccurate or incomplete data.
 - c) Right to Erasure: Request deletion of personal data when no longer necessary.
 - d) Right to Opt Out: Request to withdraw his/her consent for processing of data
 - e) Right to Nominate: Nominate another person to exercise your rights in case of incapacity.
 - f) Right to Grievance Redressal: Approach our Grievance Officer for any concerns.
15. **Data Privacy - Grievance Officer:** Given below are the contact details, name and designation of the Grievance Officer of the Zydus Wellness. This information is provided in accordance with applicable provisions of the Information Technology Act 2000 and Rules, Digital Personal Data Protection Act, 2023 (DPDP Act) and Rules; The Consumer Protection (E-Commerce) Rules, 2020 and in compliance with the applicable laws:

Name: Mr. Santosh Mane
Designation: General Counsel
Address: Zydus Wellness Limited; Zydus Corporate Park; Scheme No. 63, Survey No. 536, Near Vaishnodevi Circle; Sarkhej Gandhinagar Highway; Ahmedabad – 382481
Email Id: santosh.mane@zyduswellness.com and compliance@Zyduswellness.com
Phone: +91-79-48041564 Time: 10am to 6pm

You may exercise your rights under this Privacy Policy, including the rights of access, correction, erasure, and nomination, by submitting a request through the Online platform or by contacting our Grievance Officer using the details provided herein. All such requests must clearly specify the right you wish to exercise and provide sufficient information for us to verify your identity before acting on the

request. We will acknowledge receipt of your request and process it within the timelines prescribed under the Digital Personal Data Protection Act 2023. In case of a nomination, the nominated individual must provide appropriate documentation to establish their authority to act on your behalf. If you withdraw consent or request erasure of your personal information, we will inform you of the consequences, including any impact on your ability to access certain services, before completing the request.

16. Changes to the Policy: We keep our Privacy Policy under regular review to make sure it is up to date and accurate. We reserve rights to revise this Privacy Policy from time to time at its sole discretion. Such policy will be available on the Online platform. We recommend that you re-visit the Online platform regularly to check for any updates.