



NOVARTIS INDIA LIMITED

PRIVACY POLICY

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Privacy Policy

Novartis India Limited

1. About This Policy

Novartis India Limited (“Novartis”, “the Company”, “we”, “us” or “our”) is a healthcare-focused company incorporated under the Companies Act, 2013, with its registered office at [Insert Address], India. We operate the website www.nilpharma.co.in (the “Website”). Safeguarding the personal data of the people we engage with is important to us, and this Policy explains how we handle it.

This Policy is issued in accordance with the Digital Personal Data Protection Act, 2023 (the “DPDP Act”) and the Information Technology Act, 2000, including the rules on reasonable security practices. By using the Website or sharing your information with us, you acknowledge the practices described here. If you do not agree with this Policy, please refrain from using the Website.

2. Personal Data We Collect

We collect personal data in two ways:

Data you provide to us. When you fill in a form, register, or otherwise get in touch, you may share details such as your name, email address, postal address, telephone number, and profession, along with any other information you choose to provide.

Data collected automatically. When you browse the Website, we may collect limited technical data through cookies and similar tools — for example your IP address, browser and device type, the pages you view and time spent on them, and the website you arrived from.

3. Cookies & Similar Technologies

The Website uses cookies and similar technologies to remember your preferences, enhance your experience, and understand how the Website is used. You can disable cookies through your browser settings, although some features may then not work as intended. Where required, we seek your consent before placing non-essential cookies.

4. Why We Use Your Data

We use personal data only for specified, lawful purposes, namely to:

- respond to your enquiries and provide the information or services you request;
- operate, maintain, and improve the Website and your experience of it;
- send you updates or promotional material, where you have consented to receive them; and

- meet our legal and regulatory obligations, including drug-safety (pharmacovigilance) reporting where relevant.

5. Consent and Acknowledgement

By providing your personal data, selecting a consent option, or continuing to use the Website, you acknowledge that you have read and understood this Policy and consent to the collection and processing of your personal data for the purposes described in it. Where you provide the personal data of another person, you confirm that you are authorized to do so.

Where we rely on your consent, you may withdraw it at any time by contacting our Grievance Officer. Withdrawing consent is as straightforward as giving it and does not affect processing already carried out. If the consent you withdraw is necessary for a particular service, we may be unable to continue providing that service. Consent in respect of a child is given by a parent or lawful guardian.

6. Accuracy of Information

We take reasonable steps to keep personal data accurate, complete, and up to date for the purposes for which it is used. You are responsible for providing accurate information and for notifying us of any changes so that we can update our records. You may ask us at any time to correct or complete inaccurate or incomplete data, and we may periodically request that you confirm your details remain current.

7. Marketing Communications

We send marketing and promotional communications — such as product updates, newsletters, or event invitations — only where you have consented to receive them or where otherwise permitted by law. Every marketing message includes a simple way to unsubscribe, and you may withdraw your consent at any time through our Grievance Officer. Opting out of marketing will not affect service or transactional messages (for example, replies to your enquiries or important safety information). We do not sell or rent your personal data to third parties for their own marketing.

8. Data Sharing and Third Parties

We do not sell or rent your personal data, and we share only the minimum necessary, and only with:

- our authorized personnel and group entities, on a need-to-know basis;
- service providers (data processors) — such as IT, hosting, CRM, analytics, communication, and professional-advisory providers — who process data on our behalf under written contracts; and
- courts, regulators, or other authorities, where disclosure is required or permitted by law.

Our data processors are contractually required to use personal data only on our instructions, keep it confidential and secure, and return or delete it when their engagement ends. We carry out reasonable

due diligence before engaging them. Where personal data is transferred outside India, we do so only in accordance with applicable law.

9. CRM, Cloud Services and Analytics

We use customer-relationship-management (CRM) systems, cloud hosting, and analytics tools — some operated by third-party providers — to manage our interactions with you, store information securely, and understand how our Website and services are used. These providers act as our data processors and are bound by contracts that require appropriate security and confidentiality safeguards. Where such services involve storing or processing data outside India, we ensure this complies with applicable law. Wherever practicable, analytics data is used in aggregated or de-identified form, and you can limit analytics and non-essential tracking through your cookie settings.

10. Confidentiality and Access Control

We treat your personal data as confidential. Access is granted strictly on a need-to-know, role-based basis to authorized personnel who require it to perform their duties and who are bound by confidentiality obligations and trained in data protection. We apply controls such as unique user credentials, authentication, and access logging, and we review access rights regularly, revoking them promptly when a person changes role or leaves. Our service providers are subject to equivalent confidentiality and access-control obligations.

11. Data Security

We maintain reasonable technical and organizational security measures — consistent with Section 43A of the Information Technology Act, 2000 and the DPDP Act — to protect personal data against unauthorized access, loss, misuse, or disclosure. Depending on the risk, these measures may include encryption of data in transit and at rest, access and network controls, secure configuration and backups, vulnerability management, and periodic review and testing of our safeguards, supported by confidentiality undertakings from our staff and vendors. As no method of transmission over the internet is completely secure, we cannot guarantee absolute security, but we work continually to safeguard your data.

12. Data Retention and Erasure

We retain personal data only for as long as needed to fulfil the purpose for which it was collected, or as required by law. Once that purpose has been served and no legal obligation to retain the data remains, we delete or anonymize it.

13. Data Breach and Incident Handling

We maintain an incident-response process to detect, assess, contain, investigate, and remedy security incidents affecting personal data. If a personal data breach occurs, we will assess its likely impact, take

prompt steps to contain and mitigate it, and keep appropriate records. We will notify the Data Protection Board of India and affected individuals where, and within the timelines, required under the DPDP Act, and we review each incident to help prevent recurrence.

14. Children's Data

The Website is not directed at children. We do not knowingly process the personal data of anyone under 18 years of age without the verifiable consent of a parent or lawful guardian, and we do not carry out tracking or targeted advertising aimed at children. If you believe a child has shared data with us, please contact us so we can delete it.

15. Your Rights

Subject to applicable law, you have the right to:

- obtain a summary of the personal data we hold about you and how it is processed;
- have your personal data corrected, completed, or updated;
- request erasure of your personal data, or withdraw your consent;
- nominate another person to exercise your rights in the event of your death or incapacity; and
- raise a grievance with us, and opt out of marketing communications.

To exercise any of these rights, please contact our Grievance Officer using the details in Section 16.

16. Grievances and Contact

For any question, request, or complaint about this Policy or how your personal data is handled, please contact:

Grievance Officer

Novartis India Limited

Email: grievance@nilpharma.co.in

If your concern is not resolved to your satisfaction, you may escalate it to the Data Protection Board of India in accordance with the DPDP Act.

17. Changes to This Policy

We may update this Policy from time to time to reflect changes in law, technology, or our practices. The current version will always be available on the Website, with the effective date of the latest revision shown, and material changes will be notified as required by law.