	FLEMING LABORATORIES LIMITED	
DATA PRIVACY POLICY	Policy No.	FLL/HRD/003
	Revision No.	01
	Supersedes	00
	Effective Date	30/09/2023
	Review Due	Sep - 2026
	Page No.	Page 1 of 4

DATA PRIVACY POLICY

We, Fleming Laboratories Limited, adopted this Privacy Policy with respect to collection, use, storage and disclosure of personal information gathered by us in ordinary course of business from employees, customers, suppliers, and visitors, both online and physical visitors to our sites

INTRODUCTION

We are committed to protect the privacy of personal information and to handle the personal information in a responsible manner in accordance with the relevant privacy legislations enacted by the government of India and updated from time to time.

This Privacy Policy explains how we collect, use and disclose personal information, how anyone may access that information and how any personnel may seek the correction of any information. It also explains how any personnel may make a complaint on breach or perceived breach of privacy legislation. We may make change to our policy, processes and systems in relation to how we handle your personal information from time to time. We will update this Privacy Policy to reflect such changes.

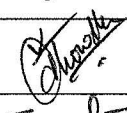

DATA COLLECTION


From Employees:

We collect the following information from our employees at the time of joining:

1. Personnel identification information (Aadhar, PAN, Passport)
2. Bank details
3. Phone numbers, address, personal email id
4. Educational qualification and copies of related certificates
5. Pre-medical health check-up and health history
6. Previous employment records

During course of employment, we collect the health data of the employees through annual medical examinations

	Name	Designation	Department	Signature	Date
Prepared By	Manohar J	Manager	HR & OD		30/09/2023
Approved By	Jeyamuruga Prakash	MD & CEO	Operations		30/09/2023

	FLEMING LABORATORIES LIMITED	
DATA PRIVACY POLICY	Policy No.	FLL/HRD/003
	Revision No.	01
	Supersedes	00
	Effective Date	30/09/2023
	Review Due	Sep - 2026
	Page No.	Page 2 of 4

From Suppliers

We collect the following information from the suppliers during the process of qualification of the supplier and during the process of purchase activity:

1. Phone numbers, address, email id
2. Bank details
3. Statutory registrations on taxation (GST)
4. PAN card
5. All statutory approvals from relevant statutory authorities (PCB, Drug control, etc) during the audit of the facilities
6. Basic technical data like process outline, route of synthesis etc (during the qualification process)

From Customers

We collect the following information from the customers during of the process of receiving and accepting the purchase orders, and supply of goods:



1. Phone numbers, address, email id
2. Bank details (for refund, etc)
3. Statutory registrations on taxation (GST)
4. PAN card
5. Copies of drug license


From Visitors

We collect the following information from the suppliers during the entry to our sites:

1. Phone numbers, address, email id
2. Copy of id

USE AND DISCLOSURE

	Name	Designation	Department	Signature	Date
Prepared By	Manohar J	Manager	HR & OD		30/09/2023
Approved By	Jeyamuruga Prakash	MD & CEO	Operations		30/09/2023

	FLEMING LABORATORIES LIMITED	
DATA PRIVACY POLICY	Policy No.	FLL/HRD/003
	Revision No.	01
	Supersedes	00
	Effective Date	30/09/2023
	Review Due	Sep - 2026
	Page No.	Page 3 of 4

We will treat all personal information as strictly private and confidential. We will only use or disclose it for purpose(s) directly related to the reason for which the information is gathered. We do not sell, trade, or otherwise transfer to other parties / agencies the personally identifiable information. This does not include trusted third parties who are part of our system in deriving information from this data (Example, the medical examiner who will review the employee health records to interpret and suggest remedies)

We may also release your information when we believe release is appropriate to comply with the law, or protect ours rights, property, or safety. However, non-personally identifiable information including statistical data may be provided to other parties, where appropriate (example auditors, regulatory authorities asking for gender spread)



Within Fleming Laboratories, the HR department is the custodian of the personal data of the employees and visitors and Marketing and Purchase departments are the custodian of customer and supplier personal data, respectively

DATA SECURITY

We maintain adequate technical and organizational security measures to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. In the course of handling Personal Data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

GRIEVANCE REDRESSAL PROCEDURE

The Human Resources Department head will be chaired for redressal of the grievance which is raised by external and internal complaints. Contact email id: headhr@fleminglabs.com.

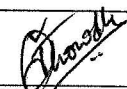

	Name	Designation	Department	Signature	Date
Prepared By	Manohar J	Manager	HR & OD		30/09/2023
Approved By	Jeyamuruga Prakash	MD & CEO	Operations		30/09/2023

**FLEMING LABORATORIES LIMITED****DATA PRIVACY POLICY**

Policy No.	FLL/HRD/003
Revision No.	01
Supersedes	00
Effective Date	30/09/2023
Review Due	Sep - 2026
Page No.	Page 4 of 4

REVISION HISTORY

S. No.	Revision No.	Reason for Revision	Effective Date
1	00	New Policy	01/07/2023
2	01	The concerned personnel for Grievance Redressal procedure is added in policy	30/09/2023

	Name	Designation	Department	Signature	Date
Prepared By	Manohar J	Manager	HR & OD		30/09/2023
Approved By	Jeyamuruga Prakash	MD & CEO	Operations		30/09/2023