PRIVACY POLICY

1. Introduction

Franco Pharmaceuticals Pvt. Ltd. (**“Franco”**, **“we”**, **“our”**, or **“us”**) respects the privacy of individuals and is committed to protecting personal data and safeguarding privacy.

This Privacy Policy describes our practices relating to the collection, use, disclosure, storage, and protection of personal data when you interact with our products, services, websites, digital platforms, and business activities.

We take reasonable technical and organizational measures to protect **Personal Information** and **Sensitive Personal Data or Information (“SPDI”)** (collectively referred to as **“Information”**) and comply with applicable legal, regulatory, and contractual obligations.

This Privacy Policy incorporates best practices adopted by ISO-certified pharmaceutical organizations and is aligned with:

The Information Technology Act, 2000 (Section 43A)

The Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011

Other applicable Indian laws and regulations

2. Definitions

Unless otherwise defined, capitalized terms shall have the meanings assigned below or as defined under applicable law:

2.1 **“Body Corporate”** means any company, firm, sole proprietorship, or association of individuals engaged in commercial or professional activities, as defined under the Information Technology Act, 2000.

2.2 **“Personal Data”** means any information relating to a natural person that, directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person.

2.3 **“Sensitive Personal Data or Information (SPDI)”** includes information relating to passwords, financial information, health conditions, sexual orientation, medical records and history, and biometric information.

2.4 **“Biometrics”** means technologies that measure and analyze human biological characteristics, including fingerprints, retinal scans, facial recognition, voice patterns, and DNA for authentication purposes.

2.5 **“Provider of Information”** means any person who provides SPDI to a body corporate.

3. Scope and Applicability

This Privacy Policy applies to all Personal Data and SPDI collected or processed by Franco through:

Website(s), mobile application(s), and digital platforms

Communications with

Franco

representatives

Business relationships and contractual engagements

Offline interactions with customers, partners, and stakeholders

Participation in events, conferences, and professional engagements

By accessing our platforms or providing Information to Franco, you consent to the collection, use, and processing of Information in accordance with this Privacy Policy.

4. Information We Collect

4.1 Sensitive Personal Data or Information (SPDI)

SPDI collected, stored, or processed may include:

Passwords

Financial information (bank account, debit/credit card details, payment instruments)

Physical, physiological, or mental health conditions

Sexual orientation

Medical records and history

Biometric information

Any related information provided for service delivery

4.2 Personal Information

Personal Information may include:

Identity Data:

Name, contact details, address, email, gender, date of birth

Technical Data:

IP address, browser type, device information, operating system

Usage Data:

Interaction with websites, applications, and services

Marketing Preferences:

Communication preferences

Audio / Visual Data:

Call recordings, video conference recordings

Geolocation Data:

Location data derived from devices or applications

4.3 Healthcare Professionals

Additional information may include:

Professional qualifications and role

Employer and specialty details

Professional experience and publications

Aggregated and de-identified prescribing information

Information available in the public domain or furnished under the Right to Information Act, 2005, shall not be treated as SPDI.

5. Methods of Information Collection

We collect Information through:

Direct interactions (forms, registrations, surveys, correspondence)

Automated technologies (cookies, server logs, pixels, web beacons)

Third-party sources (public databases, professional bodies, social platforms)

Events, conferences, and professional engagements

6. Purpose of Collection and Processing

Franco collects Information for legitimate business purposes, including:

Providing access to digital content and services

Responding to queries and feedback

Processing orders and applications

Managing contractual obligations

Regulatory, tax, and pharmacovigilance compliance

Medical inquiry handling and quality management

Fraud detection and prevention

Transparency and disclosure obligations

Medical emergencies involving threats to life

Only the minimum Information necessary is collected.

7. Legal Basis for Processing

Processing is carried out on the following bases:

7.1 **Consent**
7.2 **Contractual Necessity**
7.3 **Legal Obligation**
7.4 **Vital Interests**
7.5 **Legitimate Interests**, subject to protection of fundamental rights

8. Consent Provisions

Consent may be provided through lawful electronic or written means

Consent can be withdrawn at any time

Consent requests are presented in clear and simple language

9. Collection Notice Requirements

SPDI shall be collected only where:

Collection is lawful and necessary

The individual is informed of:

Purpose of collection

Intended recipients

Identity of collecting and retaining entities

SPDI shall not be retained beyond lawful necessity.

10. Children’s Data

Franco shall:

Not knowingly collect data from children under 13 without parental consent

Avoid

behavioral

tracking or targeted advertising to children

11. Information Security

Franco implements appropriate technical, administrative, and physical safeguards aligned with **IS/ISO/IEC standards**, including:

Information security policies and controls

Encryption of sensitive data

Access control mechanisms

Incident management procedures

Annual independent security audits

Employee training programs

Cyber security incidents are reported to **CERT-In** as required by law.

12. Information Sharing and Disclosure

Information is disclosed only:

With consent

To government authorities as required by law

For contractual or legal compliance

Third parties must adopt equivalent security standards and confidentiality obligations.

13. International Data Transfers

Personal data may be transferred within or outside India subject to:

Equivalent data protection standards

Contractual safeguards

Consent or lawful necessity

14. Cookies and Similar Technologies

Cookies and similar technologies may be used to improve functionality and user experience. Detailed information is provided in the Cookie Policy.

15. Targeted Marketing

No SPDI is used for targeted marketing

Interest-based advertising is limited to general audiences

Opt-out options are available through recognized industry mechanisms

16. User Rights

Users have rights including:

Access

Correction

Opt-out

Consent withdrawal

Erasure (where applicable)

Objection and restriction

Data portability

Requests may be submitted through the **Contact Us** section.

17. Grievance Redressal

A designated **Grievance Officer** addresses concerns within **one month** of receipt.

18. Retention Period

Information is retained only for lawful and operational necessity and is securely deleted or anonymized thereafter.

19. Changes to This Policy

Franco may revise this Privacy Policy from time to time. Updated versions will be published on the website with revised effective dates.

20. Governing Law

This Privacy Policy is governed by the laws of India. Courts at **Mumbai, India**, shall have exclusive jurisdiction.