

## **GOVERNMENT AFFAIRS AND PUBLIC POLICY** **DATA PROTECTION NOTICE**

This Data Protection Notice aims to give you information on how your personal data (i.e. information that directly or indirectly identifies you) are processed by Jazz Pharmaceuticals plc and its corporate subsidiaries and affiliates including GW Pharmaceuticals companies, (“Jazz Pharmaceuticals”) in relation to the conduct of Government Affairs and Public Policy (GAAP) and corporate communications activities.

It explains how we collect, share and use your personal data, and how you can exercise your privacy rights whether you are a politician, civil servant, policy maker, legislator, journalist, patient advocate or an individual working for patient groups and organizations or whom decisions or comments directly or indirectly impact on health and medicine, across the spectrum of patient care, medicines use, healthcare guidelines and infrastructure and other areas of direct and indirect relevance to pharmaceutical businesses such as Jazz Pharmaceuticals.

For the purposes of UK and European data protection laws, the local Jazz Pharmaceuticals or GW Pharmaceuticals company in your country is the controller of your personal data. It may exercise this responsibility alone or jointly with other companies in the Jazz Pharmaceuticals group (acting as a “co-controller”).

### **Collection of Personal Data**

Jazz Pharmaceuticals collects your personal data from a variety of sources. In most cases Jazz Pharmaceuticals will obtain information directly from you when you interact with Jazz Pharmaceuticals’ employees or representatives.

Jazz Pharmaceuticals may also collect your personal data from alternative sources including, but not limited to publicly accessible sources (such as websites, social networks/media and other digital platforms, publication databases, journals, newspapers and broadcast media, parliamentary and political reports, societies, editorial board websites, national registries, professional directories and third party healthcare professionals databases), or third party vendors and service providers acting on Jazz Pharmaceuticals’ behalf such as public relations, advocacy and government affairs agencies.

Jazz Pharmaceuticals only keep information about you that is necessary for the purposes described in this Data Protection Notice including the following:

- **General information:** name, professional postal and/or email address, phone number, communications preferences;
- **Professional information:** such as a job title, educational information, professional qualifications, work experience including scope of responsibilities and positions held, public domain information on programmes and activities participated in, publications authored or co-authored, awards, positions held in political parties, associations and boards, voting records, public statements, public domain information on professional conference and events participated in;
- **Assessment information:** such as details of interactions with Jazz Pharmaceuticals, including without limitation what kind of meetings Jazz Pharmaceuticals has held, topics discussed, your knowledge of and questions you have had on Jazz Pharmaceuticals business and products, what kind of material Jazz Pharmaceuticals employees may have displayed to you and any feedback that you have provided, as well as your opinions on areas relevant to Jazz including: Government Affairs, Public Policy, Media Relations,

Corporate Communications or Patient Advocacy activities, areas of interest, public voting records, statements you have made in the public domain and any other related information.

### **Use of Personal Data**

Jazz Pharmaceuticals may process your personal data for the purposes of managing a current or potential working relationship with you, including keeping records of interactions with you; inviting you to its events or to participate in relevant activities; answering your requests and providing you with efficient support; providing you with appropriate, adequate and updated information about disease and therapy areas, relevant company developments, as well as Jazz Pharmaceuticals' products and services where applicable and appropriate/compliant. This includes understanding your positions and actual knowledge of core therapy areas in which Jazz Pharmaceuticals is engaged to enable us to constructively engage with you, where appropriate, in order to identify solutions to address existing public policy and healthcare challenges and raise awareness of actions required in specific disease areas to improve patient care and access to medicines.

### **Legal basis of processing**

Jazz Pharmaceuticals process your personal data based on its legitimate interests such as communicating with you and managing its interactions with you regarding Jazz Pharmaceuticals' products and services (including planning potential collaboration, contact, visits and meetings) and understanding your positions on and knowledge of core therapy areas in which Jazz Pharmaceuticals is engaged to gauge the necessity and importance of direct engagement with you, to put forward our views and share scientific research and other evidence, and to facilitate knowledge-based decision making in matters of patient and public health.

### **Sharing of Personal Data**

Jazz Pharmaceuticals may disclose your personal data:

- (i) to its affiliates, service providers (e.g., public relations, advocacy and government affairs agencies) and advisors in relation to GAAP activities;
- (ii) to fraud prevention agencies and law enforcement agencies;
- (iii) to courts, governmental and non-governmental regulators and ombudsmen;
- (iv) to any third party that acquires, or is interested in acquiring, all or part of Jazz Pharmaceuticals' assets or shares, or that succeeds Jazz Pharmaceuticals in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise; or
- (v) as required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when Jazz Pharmaceuticals believes in good faith that disclosure is legally required or Jazz Pharmaceuticals has a legitimate interest in making a disclosure, such as where necessary to protect Jazz Pharmaceuticals' rights and property.

### **International Transfer of Personal Data**

Jazz Pharmaceuticals may disclose your personal data to recipients (as described above) located outside of your country in a country which may not have data privacy laws equivalent to those in your country. In such a case, Jazz Pharmaceuticals will take all necessary steps to ensure the safety of your personal data in accordance with the applicable data protection laws.

Certain international recipients of your personal data may have signed special contracts with Jazz Pharmaceuticals to provide legal protection for your transferred personal data (e.g. “Standard Contractual Clauses”).

You can request further information using the contact details below.

### **Retention of Personal Data**

Your personal data will be maintained for no longer than is necessary to fulfil the purposes outlined in this Data Protection Notice. Jazz Pharmaceuticals will store and retain your personal data in accordance with its Records Management Policy. Please note that information may be retained for a longer duration where applicable laws or regulations require, or allow Jazz Pharmaceuticals to do so.

### **Your Rights**

You have certain rights under applicable data protection laws, which may be subject to limitations and/or restrictions. These include the right to:

- request access to, and rectification or erasure of, your personal data;
- obtain restriction of processing or to object to the processing of your personal data;
- data portability (i.e. ask for a copy of your personal data to be provided to you, or to a third party, in digital format); and
- withdraw consent to the processing of your personal data where applicable.

You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority.

### **How to contact Jazz Pharmaceuticals**

All your requests, inquiries or complaints regarding this Data Protection Notice, or relating to the processing of your personal data including all requests as detailed in the Section: ‘Your Rights’ above, should be sent in writing to Jazz Pharmaceuticals’ Data Protection Officer at the following address: Jazz Pharmaceuticals, Data Protection Officer, 84 Quai Charles de Gaulle, 69006 Lyon, France or by email to: [dpo@jazzpharma.com](mailto:dpo@jazzpharma.com).