

## **HEALTHCARE PROFESSIONALS (“HCPs”) 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”). It explains how we collect, share and use your personal data, and how you can exercise your privacy rights.

For the purposes of European data protection laws, the local Jazz Pharmaceuticals or GW Pharmaceuticals company which has a relationship with you 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;
- participate in, or request to be considered for Jazz Pharmaceuticals-related activities, such as clinical trials, advisory boards or consultancies;
- register for a Jazz Pharmaceuticals-sponsored event (including online events); and
- contact Jazz Pharmaceuticals for medical information, safety or quality issues.

Jazz Pharmaceuticals may also collect your personal data from alternative sources including, but not limited to publicly accessible sources (such as websites, social media and other digital platforms, publication databases, journals, 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.

Jazz Pharmaceuticals only keep information about you that is necessary for managing its relationship with you. Depending on the relationship, Jazz Pharmaceuticals may obtain information about you including:

- **General information:** name, postal and/or email address, phone number, date of birth, payment-related information, government issued identification (e.g. passport, tax identification number), agreements, communications preferences, special conditions (dietary preferences/requirements, accessibility information);
- **Professional information:** such as a job title, educational information, professional qualifications, prescribing history, work experience, professional licenses, networks and affiliates, programs and activities participated in, publications authored or co-authored, awards, board memberships, professional conference and events, employment status, influence rankings.
- **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 have displayed to you and any feedback that you have provided, as well as your opinions and routines on prescribing, routines regarding your patients and diagnosis, and similar information.
- **Transparency information:** information related to payments and services provided, invoices and tax related information.

### **Use of Personal Data**

Jazz Pharmaceuticals may process your personal data for different purposes depending on the type of interaction Jazz Pharmaceuticals has with you:

- Conducting its business operations: for example, managing its relationship with you (e.g. through the operation of a database keeping records of interactions with health care professionals or managing call planning as well as call reporting); inviting you to its events or to participate in its activities; answering your requests and providing you with efficient support; providing you with appropriate, adequate and updated information about disease as well as Jazz Pharmaceuticals' products and services; tracking its activities (e.g. measuring interactions or sales, number of appointments/calls);
- Comply with legal, regulatory, industry best practices and ethical obligations: for example; reporting of interactions with HCPs for transparency purposes; complying with applicable laws, regulations and requests from governmental agencies (e.g. complying with pharmacovigilance data capture and reporting obligations); and complying with industry standards and its policies;
- Conduct security and fraud detection and prevention: for example to ensure security and confidentiality of your data, ensuring a safe environment at Jazz Pharmaceuticals' events, facilities or networks.
- Any other purpose that is relevant in the relationship between Jazz Pharmaceuticals and HCPs.

Jazz Pharmaceuticals will process information for further purposes, where lawful to do so (such as for archiving, scientific or market research purposes) or when legally obliged to do so.

### **Legal basis of processing**

Jazz Pharmaceuticals may process your personal data based on one or more of the following legal bases:

- Your Consent: In some cases, Jazz Pharmaceuticals may ask for your consent to collect and process your Personal Data. Where Jazz Pharmaceuticals processes your personal data based on consent, it will provide more detailed information to you at the time when it obtains your consent.
- Compliance with applicable laws or performance of a contract: In specific circumstances, Jazz Pharmaceuticals may need to process your Personal Data to comply with a relevant law/regulation or to fulfil its obligations under a contract to which you are subject.
- Jazz Pharmaceuticals' legitimate interests: Jazz Pharmaceuticals may process your personal data in its customer databases 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), scientific research, and education opportunities.

### **Sharing of Personal Data**

Jazz Pharmaceuticals may disclose your personal data:

- (i) to its affiliates, service providers (e.g., payment service providers, database hosting providers) and advisors;
- (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 processing of your personal data;
- data portability (i.e. to ask for a copy of your personal data to be provided to you, or to a third party, in digital format); and
- the right to 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 at: [dpo@jazzpharma.com](mailto:dpo@jazzpharma.com).