

Legacy Pharma Inc. SEZC and its affiliates (collectively, “**Legacy Pharma**,” “**we**,” “**our**,” or “**us**”) values your privacy and the protection of your Personal Data. This Privacy Notice (“**Notice**”) explains how we collect, store, use, share, transfer, delete, and process information collected from or about you known as **Personal Data** (defined further below in this Notice).

Purpose and Reach of this Privacy Notice

This Notice describes the types of Personal Data that Legacy Pharma may collect or process, how we may use and disclose that Personal Data, and how you may exercise any rights you may have regarding our processing of your Personal Data.

This Notice applies to Personal Data collected or processed by us:

- Through online activities and services we offer (through websites, email, online messaging services/channels, and otherwise) (“**Online Services**”);
- In connection with post-approval pharmacovigilance and adverse events, complaints, and reports;
- When we provide products or services to you or your doctor, hospital, medical treatment or scanning facility, or other healthcare provider (collectively, “**Healthcare Provider**,” which refers both to the Healthcare Provider institution, organization, or company, and individuals employed by or working for or with such organization) or, if you are a Healthcare Provider, your patients;
- When you are applying to and/or enrolled in our patient support programs, including (but not limited to) patient foundations or co-pay assistance programs;
- When you interact with us in a professional capacity, for example, if you are a Healthcare Provider or an employee of a company with which we do business or provide Products and Services;
- When we undertake employment recruiting activities; or
- Anywhere this Notice is posted or referenced.

Legacy Pharma may provide you with a different privacy notice in certain specific situations, in which case that privacy notice or policy will apply to the Personal Data collected or processed in that specific situation, rather than this one.

If you provide us with Personal Data of anyone other than yourself (such as a patient or family member), please note that you are responsible for complying with all applicable privacy and

data protection laws prior to providing that information to Legacy Pharma (including obtaining consent, if required).

Please review this Notice carefully. To the extent permitted by applicable law, by providing us your Personal Data or otherwise interacting with us, you are agreeing to this Notice.

Information Collected

What is Personal Data?

“**Personal Data**” is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link to or associate with a specific individual.

Personal Data may include information considered sensitive in some jurisdictions, such as biometric information, genetic information, health information, financial account information, specific geolocation, ethnic or racial origin, information concerning your sex life or your sexual orientation, social security number, driver’s license, state identification card, passport number, and other similar information.

We will process any Personal Data we collect in accordance with applicable law and as described in this Notice (unless, as explained above, a separate policy or notice governs).

Consumer Health Data

The law of the state in which you reside or in which your Personal Data is collected may make specific requirements in connection with Personal Data that is linked or is reasonably capable of being linked to you and that identifies your past, present, or future physical or mental health status (“**Consumer Health Data**”).

To the extent your Personal Data constitutes “Consumer Health Data,” the categories of Consumer Health Data being collected; the manner in which it will be used; the categories of sources from which it is collected; the categories of third parties and affiliates with whom it is being shared; the purposes of collecting, using and sharing it; and the manner in which it will be processed are all provided in the “Information Collected” section of this Notice (primarily as “Information regarding your treatment”).

To the extent that the state in which you live requires us to provide certain rights to you in connection with your Consumer Health Data, we will provide the following rights to you based on your state’s law:

- To request our confirmation that we are collecting, sharing, or selling your Consumer Health Data;
- To request to review and to make changes to any of your Consumer Health Data;

- To request that we delete your Consumer Health Data;
- To request a list of all third parties with whom we have shared or sold your Consumer Health Data; and
- To request that we stop collecting, sharing, or selling your Consumer Health Data.

Third Parties

Service Providers

Service providers acting on our behalf must execute agreements that generally require them to maintain confidentiality and to process Personal Data only as necessary to perform their functions in a manner consistent with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations.

Combination of Data with Data Received from Third Parties

We may combine information we collect, including Personal Data, with Personal Data that we may obtain from third parties.

In the event you wish to make a complaint about how we process your Personal Data, please contact us by selecting the “Contact Us” link at the top of our web page and we will handle your request as soon as possible. Even if you make a complaint to us, you may always lodge a complaint with the relevant authority in your location.

When we receive your Personal Data from our customers and process your Personal Data on their behalf, we do so at their request and subject to their instructions. We do not have control over our customers’ privacy and security practices and processes. If your Personal Data has been submitted to us by a Legacy Pharma customer and you wish to exercise any of the above-mentioned rights, please contact the relevant customer directly.

Safeguarding Information

Consistent with applicable laws and requirements, Legacy Pharma has put in place physical, technical, and administrative safeguards designed to protect Personal Data from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our Products and Services. In addition, it is your responsibility to safeguard any passwords, ID numbers, or similar individual information associated with your use of the Products and Services.

How Long Your Personal Data Will Be Retained

We generally retain Personal Data for as long as needed for the specific business purpose or purposes for which it was collected or obtained, and as outlined in this Notice. In some cases, we may be required to retain Personal Data for a longer period of time by law or for other necessary business purposes. Whenever possible, we aim to de-identify the information or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the Personal Data; and (iii) whether retention is determined to be necessary or advisable for Legacy Pharma due to applicable statutes of limitations, litigation, or other legal or regulatory obligations. Legacy Pharma takes reasonable steps to dispose of Personal Data upon the expiration of retention periods taking into consideration these litigation, legal, or regulatory obligations.

Special Note to Patients

If you are a patient, please note that this Notice is distinct from your Healthcare Provider's HIPAA Notice of Privacy Practices, which describes how your Healthcare Provider uses and discloses individually identifiable information about your health that it collects, as well as any other privacy practices it applies. Legacy Pharma collects, uses, and discloses any Personal Data it receives from your Healthcare Provider in accordance with its HIPAA-required agreements with your Healthcare Provider.

Changes to This Privacy Notice

We reserve the right to change this Notice from time to time. We will alert you when changes have been made by indicating the date this Notice was last updated as the date the Notice became effective or as otherwise may be required by law. It is recommended that you periodically revisit this Notice to learn of any changes.