

## Global Privacy Policy

### 1. Overview

#### 1.1 Purpose

Horizon Therapeutics plc and its operating divisions, subsidiaries, affiliates and branches (collectively, "Horizon", "we" or "us") are sensitive to privacy issues, and it is important to us to protect the information provided to us. Accordingly, Horizon provides this privacy policy to inform you about our online and certain offline information practices, the kinds of information we may collect, how we intend to use and share that information, and how you can correct or change such information ("Privacy Policy").

If you are located within the EEA, Horizon Therapeutics plc is the controller in respect of your Personal Information, which means that it is the entity which is responsible for determining the means and purposes of processing your Personal Information. If you are located outside the EEA, our US affiliate Horizon Therapeutics USA, Inc. is responsible for your Personal Information.

Certain capitalized terms used in this Privacy Policy are defined in Section 12 below.

#### 1.2 Scope

This Privacy Policy applies to Personal Information that is processed by Horizon in the course of our business, including on Horizon websites (together with any and all future websites operated by or on behalf of Horizon on which this Privacy Policy is posted, the "Websites"), and in connection with the products and services we provide (together with the Websites, the "Services").

In some situations, such as when you participate in a special program, activity, event, or clinical trial, we may inform you that our handling of your Personal Information will be governed by specific terms, privacy notices, or consent forms, in which case they will apply in lieu of or in addition to this Privacy Policy. We strongly recommend you review the additional terms prior to participating in any programs.

#### 1.3 Privacy Shield

Horizon complies with the requirements of the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce and the Federal Trade Commission ("FTC"), regarding the collection, use and retention of Personal Information from the European Economic Area (the "EEA") and Switzerland to the United States, respectively (collectively "Privacy Shield"). Horizon has certified to the Department of Commerce that it adheres to the Privacy Shield Principles and Supplemental Principles. If there is any conflict between the terms in this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view Horizon's certification, please visit <https://www.privacyshield.gov>. Additionally, Horizon may protect your data through other legally-valid methods, including international data transfer agreements. In some cases our practices may deviate from the Privacy Shield Principles where (i) required or allowed by applicable law, rule or regulation; (ii) necessary to respond to lawful requests by public authorities, including to meet national security, law enforcement, legal or governmental requirements; and/or (iii) necessary to protect the health or safety of an individual.

Except as otherwise specified, this Privacy Policy applies to all Horizon operating divisions, subsidiaries, affiliates and branches, including its U.S. affiliates certified under the Privacy Shield, namely, Horizon Medicines LLC, Horizon Orphan LLC, Horizon Pharma Rheumatology, LLC, Horizon Therapeutics Services LLC, Horizon Ophthalmology, Inc., Horizon Therapeutics USA, Inc., Horizon Orphan Holdings LLC, Horizon Therapeutics, LLC, HZNP USA, LLC and any additional U.S. subsidiary, affiliate or branch of Horizon that we may subsequently form.

If you feel that Horizon is not abiding by the terms of this Privacy Policy, or is not in compliance with the Privacy Shield Principles, please contact Horizon at the contact information in Section 9. In addition, Horizon has agreed to refer unresolved complaints related to Personal Information to JAMS Privacy Shield Dispute Resolution Program. For more information and to submit a complaint regarding Individual data to JAMS, a dispute resolution provider which has locations in the United States and EU, visit <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>. Such independent dispute resolution mechanisms are available to citizens free of charge. If any request remains unresolved, you may contact the national data protection authority for your EU Member State. You may also have a right, under certain conditions, to invoke binding arbitration under Privacy Shield; for additional information, see <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>. The FTC has jurisdiction over Horizon's compliance with the Privacy Shield.

## 2. Transparency/Notice—What Personal Information We Collect and How We Use It

The types of Personal Information we may collect (directly from you or from third party-sources) and our privacy practices depend on the nature of the relationship you have with Horizon and the requirements of applicable data protection laws and regulations. We endeavor to collect information only relevant for the purposes of processing. Below are the legal bases and some of the ways we collect information and how we use it.

### 2.1 Individuals

Horizon collects Personal Information regarding the following categories of individuals:

- Individuals who interact with Horizon in a business capacity, including, without limitation, its current, prospective and former clients, customers, visitors, guests, physicians and other health care professionals, clinical trial investigators, researchers, contract research organizations, pharmacists, research institutions, industry and patient groups and associations (“Business Contacts”);
  - visitors to Horizon's Website (“Website Visitors”); and
  - clinical trial participants, patients, patient family members, caregivers or advocates (“Clinical Trial Contacts”).

(collectively “Individuals”).

### 2.2 Personal Information Horizon Collects

**2.2.1** The data we collect from or about Individuals includes:

*For Business Contacts:*

- **Contact data**, such as title, name, address, phone number, email address, job title, and organization name.

- **Bio data**, such as your date of birth, age, marital status, interests, preferences and favorites
- **Identity data**, such as a tax identification number, driver's license and passport
- **Transaction data**, such as payment card and transaction information about payments for goods or services
- **Professional data**, such as professional credentials, educational and professional history, and institutional affiliations
- **Registration data**, such as details that may be related to a service or event you register for or attend, including conferences and patient events
- **Provider data**, which includes information pertaining to health care providers, such as information about the programs and activities in which they participate (including advisory boards and speaker programs), their prescribing of our products, and the agreements they enter into with us
- **Communications data**, such as information you provide in emails, on phone calls, in market research surveys, or in other correspondence with Horizon or its service providers or business partners

*For Website Visitors:*

- **Contact data**, such as title, name, address, phone number, email address, job title, and organization name.
- **Profile data**, such as your user name, password, and answers to any security questions that you may set to establish an online account with us
- **Content** you submit to us or upload to the Websites, such as comments, stories, photographs and other images, and videos
- **Communications data**, such as information you provide in emails, on phone calls, in market research surveys, or in other correspondence with Horizon or its service providers or business partners
- **Social media interactions**, such as the information you provide when you interact with us or our pages on social media platforms like Facebook Twitter, LinkedIn or Instagram

*For Clinical Trial Contacts:*

- **Contact data**, such as title, name, address, phone number, email address, job title, and organization name
- **Identity data**, such as a tax identification number, driver's license and passport
- **Bio data**, such as your date of birth, age, marital status, nationality, ethnic origin, gender, interests, preferences and favorites
- **Registration data**, such as details that may be related to a service or event you register for or attend, including conferences and patient events

- **Communications data**, such as information you provide in emails, on phone calls, in market research surveys, or in other correspondence with Horizon or its service providers or business partners
- **Health data**, such as information regarding your medications, medical history medical insurance details, physical and mental health conditions, diagnoses, treatments, genetic information, and family medical history) that we collect in connection with your participation in clinical trials, patient programs, expanded access programs or similar programs or where we are required to by legal requirements (such as adverse event reporting requirements). We collection such information from your healthcare professional only where your healthcare professional has obtained your consent to disclose that information to us, as required by law.

### 2.2.2 Automatic collection

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your activity over time on our sites and other sites and online services, such as:

- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, IP address, unique identifiers (e.g., Apple's ID for Advertising or Google's Advertising ID), the website you visited before browsing to our website, and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
- **Security data**, such as security camera footage recorded at our offices and facilities.

### 2.2.3 Cookies

Like many online services, we use cookies and similar technologies to facilitate some of our automatic data collection online:

- **Cookies**, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of tracking user activity and patterns, helping you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience.
- **Web beacons**, also known as pixel tags or clear GIFs, which are typically used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked, typically to compile statistics about usage of websites and the success of marketing campaigns.

## 2.2.4 Sources of Personal Information

The sources of the Personal Information we collect include:

- You
- Automatic collection
- Business Contacts
- Public sources, including government agencies, public records, social media websites and other publicly available sources
- Data providers, such as information services and data licensors

## 2.3 How Horizon Uses Your Personal Information

Depending on how you interact with Horizon, your Personal Information may be processed by us, or our affiliates, agents, employees, delegates or sub-contractors for the following purposes (the legal basis we rely on for such processing under European data protection law where applicable is indicated in italics):

- **Service delivery**

- To deliver a specific program or service to you, when you enroll to receive the program or service, including Horizon's patient hub, peer mentor programs, nurse advocate programs
- In order for us to receive the benefit of a service agreement that we have with you or your business or employer

*Legal basis: Our use is necessary for the performance of a contract with you*

- Providing you with information or other materials that you may request, e.g. information about a product or program we are offering, or samples of a Horizon product
- Generally managing your information and accounts
- Responding to questions, comments and requests
- Facilitating your registration and attendance at conferences, webinars and other events

*Legal basis: Our use is for our legitimate interest in providing information and services that you have requested in relation to our programs (including operation of the websites).*

- **Website operation**

- Maintaining and improving the Websites
- Better understanding your needs and interests in relation to the Websites
- Personalizing your experience on the Websites
- Providing support and maintenance for the Websites
- Providing access to certain areas and features of the Websites
- To measure interest in our Websites, programs and services
- To send you communications regarding the Horizon Website, programs or services, your account, or any changes to any Horizon policy or terms of service

*Legal basis: Our use is for our legitimate interest in operating the Websites*

- **Research and surveys**

- Using the results for research and reporting purposes to help us better serve Individuals by learning more about their needs and the quality of the Services we provide
- Utilizing the responses to determine the effectiveness of our Websites, various types of communications, advertising campaigns and/or promotional activities

*Legal basis: Your consent (when requested) to our use for these purposes*

- **Business administration**

- Performing internal quality control
- Verifying an Individual's identity
- Processing payments
- Managing access to our products
- To enforce our Terms of Use for our Website

*Legal basis: Our use is for our legitimate interest in administering our business effectively.*

- **Compliance**

- Managing access to our products, including where access is limited by law to licensed physicians
- Preventing prohibited or illegal activities
- To respond to subpoenas or requests from government authorities
- To comply with regulatory monitoring and reporting obligations relating to adverse events, product complaints and financial disclosures
- For anti-fraud protection

*Legal basis: Our use is necessary for compliance with legal and regulatory obligations to which we are subject.*

- **Marketing**

- Providing you with materials about offers, products and services offered by us, including new content or services on the Websites

*Legal basis: Your consent (where requested) to receive this information.*

- **Product research and development**

- Performing clinical trials
- Product improvement
- Staffing and manage clinical trials, including by recruiting investigators and participants
- Tracking and responding to safety and product quality concerns, including product recalls
- Defining and managing patient engagement activities and patient support programs

*Legal basis: Your explicit consent (where requested) to our use for these purposes.*

- **Community engagement**

- Supporting public health initiatives, symposia, conferences, and scientific, educational and volunteer events
- Identifying and engaging thought leaders and other experts
- Awarding scholarships and grants

*Legal basis: Our use is for our legitimate interest in facilitating and supporting these activities*

For Individuals located within the EEA, where we process your Personal Information based on your consent, you are entitled to withdraw this consent at any time by contacting us using the details set out in section 9 below.

## **2.4 Social Media**

Generally, online social media resources are interactive tools that enable you to collaborate and share information with others. Social media resources include, but are not limited to, social networks, discussion boards, bulletin boards, blogs, wikis, and referral functions to share web site content and tools with a friend or colleague.

When you visit or interact with our pages on social media platforms, the platform provider's privacy policy will apply to your interactions and their collection, use and processing of your Personal Information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.

Horizon may collect Personal Information to enable you to use online social media resources offered either by Horizon or a third party. We may also enable you to use these social media resources to post or share Personal Information with others. When using social media resources, you should take into careful consideration what Personal Information you share with others.

If you use an online social media resource offered by a third party ("Third Party SMR") through the Horizon Website, you acknowledge that Horizon may be able to access any information you make public through such Third Party SMR (such as your username, comments, posts and contacts) and other information your privacy settings on such Third Party SMR permit Horizon to access.

## **2.5 Direct Mail, Email and Outbound Telemarketing**

You may receive periodic emails, newsletters, mailings or phone calls from us with information on Horizon or our business partners' products and services or upcoming special offers/events we believe may be of interest. We will direct these communications to you only with your consent, where required by law. You may opt-out of these communications at no cost to the individual by following the instructions in Section 3 below.

## **2.6 Website Visitors – Mobile Devices**

Horizon may provide websites and online resources that are specifically designed to be compatible and used on mobile devices. Horizon will collect certain information that your mobile device sends when you use such websites or online resources, like a device identifier, user settings and the operating system of your device.

Mobile versions of Horizon's Websites may require that users log in with an account. In such cases, information about use of each mobile version of the website may be associated with user accounts. In addition, Horizon may enable Individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these

tools may store information on mobile or other devices. These tools may transmit Personal Information to Horizon to enable Individuals to access user accounts and to enable Horizon to track use of these tools. Some of these tools may enable users to email reports and other information from the tool. Horizon may use personal or non-identifiable information transmitted to the Company to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Horizon provides.

## **2.7 Anonymous Information**

Horizon may use your Personal Information and other information about you to create aggregated or other anonymous information by excluding information makes the data personally identifiable to you. Horizon may use and share such information to improve our products and services, develop new products and services, and for public health, research, analytics and any other lawful purposes.

## **3. Choice/Modalities to Opt Out**

### **3.1 Withdrawal of Consent**

Where we process your Personal Information based on your consent, you are entitled to withdraw this consent at any time by contacting us using the details set out in section 9 below.

### **3.2 Marketing Communications**

An “Unsubscribe” button will be provided at the top or bottom of each email communications sent by Horizon so that you can opt-out. However, we may continue to send transaction-related emails regarding products or services you have requested in response to such request. We may need to send you certain communications regarding the Horizon programs and services and you will not be able to opt out of those communications – e.g., communications regarding updates to our Terms of Use or this Privacy Policy.

We maintain telephone “do not call” lists and “do not mail” lists as mandated by law. We process requests to be placed on do not mail, do not phone and do not contact lists within 60 days after receipt, or such shorter time as may be required by law.

### **3.3 Testimonials and Other Content**

If you gave us prior opt-in consent to post a testimonial or other content on our Website (such as videos or images), but wish to update or delete such information, please contact us at [privacy@horizontherapeutics.com](mailto:privacy@horizontherapeutics.com).

### **3.4 “Do Not Track”**

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Horizon does not recognize or respond to browser-initiated DNT signals. For information about “do-not-track”, visit <http://www.allaboutdnt.org>.



### 3.5 Advertising Choices

We may use certain tools offered by third parties, including those offered by Facebook, Inc. (“Facebook”), that enable such third party to collect or receive information about actions users take over time on: (a) our Website and elsewhere on the internet through use of cookies, pixel tags and other storage technologies; or (b) a Horizon mobile application and other mobile applications, in order to provide interest-based advertising.

Interest-based advertising is advertising that tries to make the ads you see more interesting and relevant to you based on the types of sites you visit online and other information that does not personally identify you. Advertisements on Third-Party websites that contain the AdChoices link and that link to this Privacy Policy may have been directed to you based on information collected by advertising partners over time and across websites. Some of these advertisements provide a mechanism to opt- out of the advertising partners’ use of this information for interest-based advertising purposes.

For more information regarding the collection and use of such information by Facebook, please see the Facebook Data Policy, available at: <https://www.facebook.com/policy.php>.

You can opt out of the collection and use of your information for interest-based advertising by participating companies by going to <http://optout.aboutads.info> or <http://www.youronlinechoices.eu/> to limit collection through the Website or by configuring the settings on your mobile device to limit ad tracking through the mobile applications. Not all advertising companies participate in these opt out programs.

## 4. How Horizon Shares Your Personal Information

### 4.1 Information We Share

We will, from time to time, send some of your Personal Information to certain recipients, as detailed below:

#### 4.1.1 Service Providers

Horizon may share Personal Information with our service providers that we have retained to perform services on our behalf, including:

- Contract research organizations that conduct clinical trials
- Data storage and analytics
- Customer service and patient support providers (including for product quality and adverse event reporting, patient education, and Horizon’s nurse advocate program and patient hub, and to patient access managers)
- Product recall administration
- Technology services and support (including email and web hosting providers, marketing and advertising technology providers, and email communications providers)
- Event planning organizations that help facilitate Company programs
- Payment, shipping and fulfillment service providers

This is done where the disclosure is necessary in our legitimate interest in effectively conducting, streamlining, operating and further improving our business. Horizon has executed appropriate contracts with the service providers that prohibit them from using or sharing your personal information except as authorized and to ensure that they process your Personal Information in accordance with applicable law.

#### **4.1.2 Business Partners**

Horizon may share Personal Information with our business partners, and affiliates for our and our affiliates' for our legitimate business purposes or to provide you with a product or service that you have requested. With your prior, opt-in consent where required by law, Horizon may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Horizon's. Horizon requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which it was provided.

With your prior explicit consent where required by law, we may also share your Personal Information with health care professionals, researchers, academics, and public health organizations for health research purposes.

#### **4.1.3 Privacy Shield**

With respect to onward transfers to third parties under Privacy Shield, Privacy Shield requires that Horizon remain liable should its third party service providers process Personal Information in a manner inconsistent with the Privacy Shield Principles.

#### **4.1.4 Other Individuals and the Public**

We may provide functionality that enables you to disclose Personal Information to other individuals or the public. For instance, you may also be able to submit content to the Websites or otherwise through the Services (such as comments, stories, photos, and videos), and we may display your name along with the content you submit. You may also choose to participate in certain of our programs, such as a peer mentoring program, that requires Horizon to share certain of your information, such as your contact information, with a third party, such as a peer mentor, at your direction. We do not control how other individuals use any Personal Information that you make available to such individuals or the public. If you wish to opt out of such sharing, you may do so by following the instructions in Section 3.3 of this Privacy Policy, or as otherwise described when you submitted the content or signed up for the Service.

#### **4.1.5 Information Disclosed for Our Protection and the Protection of Others**

We may disclose information about you to other third parties, such as governmental agencies and regulators (e.g. tax authorities), social insurance carriers, courts, government authorities and to external advisors acting as controllers (e.g. lawyers, accountants, auditors etc.). Such transfers are made in order to comply with our legal obligations and for the legitimate purposes pursued by Horizon or a third party to ensure the protection of our business, including: (i) if we are required to do so by law, court order or legal process; (ii) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements; (iii) under the discovery process in litigation; (iv) to enforce Horizon policies or contracts; (v) to collect amounts owed to Horizon; (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity.

In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Websites. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order that they may identify users in connection with their investigation of the unauthorized activities.

#### **4.1.6 Information Disclosed in Connection with Business Transactions**

We may disclose or transfer any information we have about you (including Personal Information) in the event of a proposed or actual purchase, any reorganization, sale, lease, merger, joint venture, assignment, amalgamation or any other type of acquisition, disposal or financing of all or any portion of our business or of any of the business assets or shares (including in connection with any bankruptcy or similar proceeding). Should such an event occur, Horizon will endeavor to direct the transferee to use Personal Information in a manner that is consistent with this Privacy Policy. The purpose of such processing is to allow for the sale or transfer of our shares, assets or business and the legal basis for doing so under European data protection law, where applicable, is our legitimate interest in being able to manage our business by conducting such a sale or transfer.

## **4.2 Data Transfers**

Horizon does not send or otherwise transfer Personal Information about you to recipients in countries located outside of the EEA, except in the following circumstances or as otherwise described in this Privacy Policy.

All Personal Information sent or collected via or by Horizon may be stored in countries located outside of the EEA, including but not limited to, in the United States, in the cloud, our servers, the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. Data protection laws in these jurisdictions may not be deemed to provide as adequate a level of protection for your Personal Information as those of your home country. To ensure that your Personal Information receives an adequate level of protection, any transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

In particular, Horizon uses the Privacy Shield certification mechanism in order to lawfully transfer Personal Information to its US subsidiaries (and such subsidiaries may transfer such Personal Information in accordance with applicable onward transfer requirements). Horizon also uses the standard contractual clauses approved by the European Commission in order to lawfully transfer Personal Information to third parties located outside the EEA.

## **5. Retention**

Horizon only retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Websites or as necessary to fulfill the purpose(s) for which it was collected, including for the purposes of providing our products and services, to resolve disputes, to establish legal defenses, to conduct audits, to pursue legitimate business purposes, to enforce our agreements and to comply with applicable laws.

## **6. Security**

The security of all Personal Information provided to Horizon is important to us, and Horizon has put in place appropriate technical and organizational measures designed to protect your Personal Information, including measures designed to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Information to only those employees, agents and contractors who are authorized to access your data.

Unfortunately, no data transmission over the Internet or storage of information can be guaranteed to be secure. As a result, while Horizon strives to protect your Personal Information, we cannot ensure or warrant the security of any information processed by Horizon, and you do so at your own risk. You are responsible for maintaining the secrecy of your own passwords. If you have reason to believe that your passwords or Personal Information is no longer secure, please promptly notify Horizon at [privacy@horizontherapeutics.com](mailto:privacy@horizontherapeutics.com).

## **7. Automated Decision-Making**

We do not envisage that any decisions will be taken about you using automated means, however, where required by law, we will notify you in writing if this position changes.

## **8. EEA Data Subject Rights**

This section applies only to data subjects based in the EEA, who have certain rights under European data protection legislation, as summarized below:

- to request access to your personal information;
- to request rectification of inaccurate or incomplete personal information;
- to request erasure of your personal information;
- to restrict the processing of your personal information;
- to object to our use of your personal information;
- where relevant, to request the portability of your personal information;
- where you have given consent to the processing of your personal information, to withdraw your consent; and
- to lodge a complaint with the competent supervisory authority.

Your rights will in each case be subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your Personal Information, can be obtained by contacting us using the details in the 'Redress/Compliance and Accountability' section below.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your Personal Information, or request that we transfer a copy of your Personal Information to another party, please contact us using the details in the 'Redress/Compliance and Accountability' section below.

If you have any grievance, issue or problem in respect of our handling or processing of your Personal Information in any way, you have the right to lodge a complaint to the Irish Data Protection Commission, whose contact details are as follows:

**Telephone**

1890 252 231

**E-mail**

[info@dataprotection.ie](mailto:info@dataprotection.ie)

**Address**

Data Protection Commission  
21 Fitzwilliam Square South  
Dublin 2  
D02 RD28  
Ireland

**9. Redress/Compliance and Accountability**

If after reviewing this Privacy Policy, you would like to submit a request or you have any questions or privacy concerns, please contact:

For Individuals located within the EEA:

Data Protection Officer  
Horizon Therapeutics plc  
Compliance  
Connaught House, 1st Floor, 1 Burlington Road, Dublin 4, Ireland  
privacy@horizontherapeutics.com  
Phone: +353 (0)1 772 2100

For Individuals located outside Europe:

Chief Compliance Officer  
Horizon Therapeutics USA, Inc.  
Compliance  
150 S. Saunders Road  
Lake Forest, Illinois 60045  
privacy@horizontherapeutics.com  
Phone: (224) 383-3210

**10. Other Rights and Important Information****10.1 Information Regarding Children**

Horizon does not knowingly solicit or collect Personal Information from children under the age of 18 (or who have otherwise not attained the applicable age of consent in the applicable jurisdiction). If we learn that we have collected Personal Information from a child under the age of 18 (or other applicable age of consent in the relevant jurisdiction), we will promptly delete that information.

We may collect Personal Information in relation to children under the age of 18 where the child is participating in a clinical trial, and we will comply with applicable law when doing so.

**10.2 Links to Third-Party Websites**

Please note that our Websites may contain links to other websites for your convenience and information. Horizon does not control Third-Party websites or their privacy practices, which may differ from those set out in this Privacy Policy. Horizon does not endorse or make any representations about Third-Party websites. Any Personal Information you choose to give to unrelated Third Parties is not covered by this Privacy Policy. Horizon encourages you to review the privacy policy of any company or website before submitting your Personal Information. Some third parties may choose to share their users' Personal

Information with Horizon; that sharing is governed by that company's privacy policy, not this Privacy Policy.

### 10.3 Changes to the Privacy Policy

Horizon may update this Privacy Policy from time to time as it deems necessary in its sole discretion. You are advised to review this Privacy Policy periodically to be informed regarding how Horizon is using and protecting your information and to be aware of any policy changes. Changes to this Privacy Policy are effective when they are posted on our website. Your continued relationship with Horizon after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Privacy Policy take effect immediately after being posted or otherwise provided by Horizon.

## 11. Information for California Residents

This section applies only to California residents. It describes how we collect, use and share the Personal Information of California residents in operating our business, and the rights that you have with respect to your personal information if you are a California resident. For purposes of this notice:

- "Personal Information" has the meaning given in the California Consumer Privacy Act of 2018 (CCPA), but does not include certain information exempted from the CCPA's scope, including, without limitation, information we collect in connection with clinical trials, information governed by California's Confidentiality of Medical Information Act, information governed by the Health Insurance Portability and Accountability Act of 1996 or information pertaining to our Business Contacts
- "Horizon", "we", "us" and "our" refer to Horizon group companies that constitute a "business" under CCPA.

### 11.1 Your California Privacy Rights

If you are a California resident, you have the following rights:

- **General Disclosure.** To request that we disclose to you:
  - The categories of Personal Information that we have collected about you during the past 12 months.
  - The categories of sources from which Personal Information is collected.
  - The business or commercial purpose for collecting or selling Personal Information.
  - The categories of third parties with whom we share your Personal Information.
  - Whether we've disclosed your Personal Information to third parties for a business purpose, and if so, the categories of Personal Information we disclosed, and the categories of third parties to whom we disclosed it.
  - Whether we have sold your Personal Information, and if so, the categories of Personal Information we sold, and the categories of third parties to whom we sold it.
- **Access.** To request a copy of the Personal Information that we have collected about you.
- **Deletion.** To request that we delete Personal Information about you that we have collected from you.
- **Nondiscrimination.** To exercise your rights described above free from discrimination, such as discriminatory price increases or decreases in service quality prohibited by law.

## 11.2 How to Exercise Your Rights

You can request a general disclosure, access or deletion as described above by:

- emailing [privacy@horizontherapeutics.com](mailto:privacy@horizontherapeutics.com)
- calling us toll free at 1-866-320-4277 in the United States
- submitting a request at <https://www.horizontherapeutics.com/company/contact>

We will need to confirm your identity to process your requests to exercise your information, access or deletion rights. As a part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification. We also reserve the right to confirm your current California residency. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain cases, we may decline your request as permitted by law.

## 11.3 Personal Information That We Collect, Use and Share

The list below summarizes, with respect to the Personal Information categories specified in the CCPA, the Personal Information we collect, the sources of that Personal Information, the business/commercial purpose for which we collect it, and the third parties with whom we share it, all of which are described in more detail in the general section of this Privacy Policy. The list below generally describes our practices for the 12-month period preceding the effective date of this Privacy Policy.

- **Identifiers** (excluding online identifiers)
  - Categories: Contact Data, Bio Data, Identity Data, Registration Data, Provider Data, Profile Data, Communications Data, Social Media Interactions
  - Sources: You, Business Contacts, Public Sources, Data Providers
  - Purposes: Service Delivery, Website Operation, Research and Surveys, Business Administration, Compliance, Marketing, Product Research & Development, Community Engagement
  - Third Parties: Service Providers, Business Partners, Other Individuals and the Public
- **Commercial information** (e.g., purchase history)
  - Categories: Transaction Data, Provider Data
  - Sources: You, Business Contacts
  - Purposes: Service Delivery, Business Administration, Compliance
  - Third Parties: Service Providers
- **Financial Information**
  - Categories: Transaction Data
  - Sources: You
  - Purposes: Service Delivery, Business Administration, Compliance
  - Third Parties: Service Providers
- **Online Identifiers**
  - Categories: Device Data
  - Sources: Automatic Collection
  - Purposes: Service Delivery, Website Operation, Research and Surveys, Business Administration, Compliance, Marketing, Community Engagement
  - Third Parties: Service Providers, Business Partners

- **Internet or Network Information**
  - Categories: Device Data, Online Activity Data, Security Data, Content
  - Sources: Automatic Collection
  - Purposes: Service Delivery, Website Operation, Research and Surveys, Business Administration, Compliance, Marketing, Community Engagement
  - Third Parties: Service Providers, Business Partners, Other Individuals and the Public (for some Content)
- **Professional or Employment Information**
  - Categories: Contact Data, Bio Data, Registration Data, Communications, Social Media Interactions
  - Sources: You, Business Contacts, Public Sources, Data Providers
  - Purposes: Service Delivery, Website Operation, Research and Surveys, Business Administration, Compliance, Marketing, Product Research & Development, Community Engagement
  - Third Parties: Service Providers, Business Partners
- **Sensory Information** (e.g., photos, video)
  - Categories: Content, Security Data
  - Sources: You, Automatic Collection
  - Purposes: Service Delivery, Website Operation, Business Administration, Compliance
  - Third Parties: Service Providers, Business Partners, Other Individuals and the Public (for some Content)
- **Protected Classification Characteristics**
  - Categories: Bio Data
  - Sources: You, Business Contracts, Data Providers
  - Purposes: Service Delivery, Website Operation, Research and Surveys, Business Administration, Compliance, Marketing, Product Research & Development, Community Engagement
  - Third Parties: Service Providers, Business Partners, Other Individuals and the Public

Based on our present understanding of the term “sell” under the CCPA, we do not “sell” your Personal Information and have not sold it to third parties for a business or commercial purpose in the 12 months preceding the effective date of this Privacy Policy. However, like many companies online, we use services provided by Facebook and others that help deliver interest-based ads to you as described in the section above entitled Advertising Choices.

## 12. Definitions

“Data Subject” is an identified or identifiable natural person.

“Personal Information” is, except as otherwise specified in this Privacy Policy, any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. In the case of Individuals in the EEA, the term “Personal Information” means personal data within the meaning of applicable privacy and data protection laws including the General Data Protection Regulation ((EU) 2016/679) (the “GDPR”).

“Privacy Shield Principles” collectively means the seven (7) privacy principles as described in the Privacy Shield: (1) notice, (2) choice, (3) accountability for onward transfer, (4) security, (5) data



integrity and purpose limitation, (6) access, and (7) recourse, enforcement and liability. Additionally, it includes the sixteen (16) supplemental principles described in the Privacy Shield: (1) sensitive data, (2) journalistic exceptions, (3) secondary liability, (4) performing due diligence and conducting audits, (5) the role of the data protection authorities, (6) self-certification, (7) verification, (8) access, (9) human resources data, (10) obligatory contracts for onward transfers, (11) dispute resolution and enforcement, (12) choice – timing of opt-out, (13) travel information, (14) pharmaceutical and medical products, (15) public record and publicly available information, and (16) access requests by public authorities.

“Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Sensitive Data” or “Sensitive Personal Information” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes Personal Information regarding EU-residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the individual's sex life; or (8) information relating to the commission of a criminal offense.