



Harmony Healthcare Provider, Investigator, and Institution Staff Privacy Notice

Effective Date: 04/01/2025

This Healthcare Provider, Investigator, and Institution Staff Privacy Notice (this “HCP Privacy Notice”) in combination with the our Privacy Notice (“Privacy Notice”) explains the Personal Data handling practices of Harmony Biosciences Holdings, Inc. and all its direct and indirect subsidiaries (referred to throughout this Notice as “Harmony”, the “Company”, “we”, “our”, or “us”) with respect to Personal Data we collect about health care professionals, investigators, and institution (“HCPs”). Harmony takes the security of Personal Data and privacy of our HCPs (referred to throughout this Notice as “you” and “your”) very seriously. This HCP Privacy Notice will provide clear, detailed, and easy-to-read information about our privacy practices, and provide information about the Personal Data we collect, use, and disclose.

Scope

This HCP Privacy Notice applies to all Personal Data collected, used, and shared by Harmony in relation to our HCPs in compliance with applicable data protection laws and regulations. This Notice provides you with necessary information regarding your rights and obligations, and explains how, why, and when we collect, process, and share your Personal Data. For purposes of this HCP Privacy Notice, Harmony is the data controller of your Personal Data.

What is Personal Data?

When we use the term “Personal Data” in this HCP Privacy Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to a natural person. It does not include aggregated or anonymous information that is maintained in a form that is not reasonably capable of being associated with or linked to a natural person. Examples of Personal Data include, but are not limited to name, email address, phone number, physical address, key-coded identifiers, user ID, IP address, date of birth, marital status, gender, medical history, or preferences.



Sensitive Personal Data: Certain Personal Data may be considered sensitive or a special category of Personal Data under applicable data protection laws. Many of these laws provide extra protection for, or obligations with respect to, such Sensitive Personal Data. Examples of Sensitive Personal Data include, but are not limited to health data, biometric information, genetic information, precise geolocation information, information about racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, information concerning sex life or sexual orientation, or financial identifiers like account numbers, social security numbers, national identifiers, and passport numbers.

Personal Data We Collect

Harmony may obtain Personal Data directly from you, or from indirect sources such as professional networks, public sources, and through your consent and preference information. Please see the list of Personal Data elements Harmony may collect below:

Types of Personal Data	Data Elements
Personal Identifier	Name, sex, gender, age, date of birth, nationality, social security number, driver's license/state ID, place of birth, citizenship, passport number
Contact Information	Postal or mailing address, personal or business email address, personal or business phone number
Professional Related Information & Consent Information	Job title, place of practice, branch office, department, qualifications, affiliations, publications, professional activities, area(s) of expertise, professional registration number, medical practitioner number, prescribing information, photograph, academic information, resume/CV, W9, payment information and background check
Usage Data	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement
Inferences	Inferences drawn to create a profile reflecting your preferences, interests, scope, specialty, preferences, and interactions with us



Sensitive Personal Data

Of the above categories of Personal Data, the following are the sensitive data that Harmony may collect:

1. Personal Identifiers (social security number, driver's license or state identification card number, passport number)
2. Medical and Health Information
3. Insurance Information
4. Health and Wellness Information
5. Ethnicity

Harmony may process this data as necessary for healthcare purposes.

Why do we collect and use your Personal Data?

The Personal Data and Sensitive Personal Data that we collect, and process may vary depending on specific circumstances. We may collect and process Personal Data and Sensitive Personal Data we collect from you or about you for one or more of the following purposes.

Processing Purposes	Description	Lawful Bases
Clinical Trial Management	<ul style="list-style-type: none"> • Communication regarding studies being undertaken by us and our collaborators • Study management, including monitoring of study activities • Identifying and evaluating investigators, sites, and supporting personnel for potential study participation • Exploring potential collaborations and studies • Investigating and reporting adverse event information and product complaints 	Legitimate interest Contract

<p>Fee for Service</p>	<ul style="list-style-type: none"> • Training or scientific and educational programs • Evaluating professional history for compliance purposes • Engaging, maintaining, and/or ranking of key scientific and medical experts and leader's profiles • Identification of professional expertise for commercial activities 	<p>Legitimate interest Consent</p>
<p>Marketing & Analytics</p>	<ul style="list-style-type: none"> • To perform analytics, market research, and segmentation to understand your preferences, improve our products and services and our communications to you. • To create and manage a database to identify and engage with you based on your professional expertise, opinions, and past interactions. • Communicating information about our studies or products (direct marketing, including social media and other third-party websites) 	<p>Legitimate interest Consent</p>
<p>Safety</p>	<ul style="list-style-type: none"> • To conduct audits aimed at improving healthcare outcomes • To assess suitability and improve products and treatments 	<p>Legal Obligation Public Interest</p>

	<ul style="list-style-type: none"> • Detecting, preventing, or investigating misconduct, safety, and product concerns • To monitor any adverse reactions or quality issues 	
Compliance with Laws	<ul style="list-style-type: none"> • To report and investigate complaints, claims, and unexpected incidents • To report events to the authorities when required by law • To manage and mitigate risks related to patient safety and data security • To maintain follow-up on drug safety notifications • To perform clinical trials in accordance with law, and to follow guidelines and conditions of marketing approval for medications studied in clinical trials 	Legal obligation

Disclosing Your Personal Data

Subject to applicable laws, including obtaining consent where required, we may share Personal Data under the following circumstances:

1. **Third-Party Service Providers:** We may engage third-party service providers to assist with a variety of activities including clinical research, safety and regulatory reporting, marketing, and to manage or host certain information systems on our behalf. These providers are contractually obligated to handle your Personal Data in compliance with applicable data protection laws and regulations. They are contractually obligated to handle your information in compliance with privacy laws and regulations to protect your data and use it solely for its intended purposes. Additionally, we require these third-party providers to implement appropriate



security measures to safeguard your information against unauthorized access, disclosure, or misuse.

2. **Clinical Trials.** If you participate as an HCP in any studies we conduct, we may publicly disclose your name and work contact information, and your association with us. This data may be posted online such as on the European Clinical Trials Database, ClinicalTrials.gov, and similar sites; this data may also be included in printed material.
3. **Our Affiliates:** We may share Personal Data with our affiliates for internal administrative purposes, such as managing employee activities, coordinating projects, and to maintain compliance with Harmony policies and procedures. For a list of Harmony's affiliates, please contact us by email at Privacy@harmonybiosciences.com.
4. **Regulatory Authorities:** We may disclose your Personal Data to comply with legal obligations, regulations, or contracts, or in response to a court order, administrative, or judicial process, such as a subpoena, government audit, or search warrant. Additionally, we may share your information to address threats to the physical safety of any person, violations of our policies or other agreements, including our employees, users, or the public.
5. **Consent:** We may share your Personal Data in other ways if you have requested us to do so or have provided your consent.
6. **Subsequent Owners.** In the event of a merger, acquisition, sale, reorganization, or other transfer or sale of Harmony businesses, assets, or stock, your Personal Data may be shared and subsequently controlled by another entity.

We generally do not sell HCPs' Personal Data for monetary or other valuable consideration, or "share" Personal Data pertaining to HCPs as the term "share" is defined by the California Consumer Privacy Act ("CCPA"). However, we do share and have shared in the past 12 months online identifiers and internet activity information we collect from visitors to our websites to our advertising cookie partners for marketing purposes, which may include Personal Data about HCPs. To opt out of the sharing of your Personal Data, please visit our [Privacy Center](#).



How We Protect the Information That We Collect

The security of your Personal Data is a priority for us. We protect your Personal Data by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards. If you have additional questions about how we secure your Personal Data, please get in touch with us.

While we strive to protect your Personal Data, no such security measures can guarantee complete protection from theft, loss, or other unauthorized access or use. No information system can be fully secure, and we cannot guarantee the absolute security of your personal information. Moreover, we are not responsible for the security of personal information you transmit to the website over networks that we do not control, including the internet and wireless networks, and you provide us with any personal information and data at your own risk. To the extent permitted by law, we shall not be liable or otherwise responsible for any data incident or event that may compromise the confidentiality, integrity, or security of your personal information caused by a third-party.

Retention of Personal Data

We will retain your Personal Data for as long as reasonably appropriate for the purposes for which it was originally collected and in adherence with Harmony's data retention policies. When determining the appropriate retention period, we consider factors such as:

- Whether you have withdrawn your consent, and no other legal grounds for processing apply;
- Any legal requirements for retaining Personal Data; and
- The expiry of relevant statutes of limitations.

International Data Transfers

Harmony is a global organization providing services worldwide. As a result, we may need to transfer Personal Data collected in connection with our services to entities in countries with different data protection standards than those in the country where you reside. However, we will use appropriate safeguards defined by applicable data protection regulations to facilitate the transfer. We will also practice data minimization and implement pseudonymization where possible to limit access of Personal Data from outside the jurisdiction of origin.



If you are located in the EEA or the U.K., be advised that we have implemented the European Commission’s Standard Contractual Clauses for transfers of Personal Data between our affiliates, partners and collaborators, which require parties to protect Personal Data they process from Europe in accordance with local data protection laws.

Your Rights

Subject to certain conditions and applicable data protection law, you may have rights regarding your Personal Data that we collect or process. These rights are inherent to each Data Subject and, therefore, are inalienable and are the following:

1. **Right to be Informed.** You have the right to be informed about the collection and use of your Personal Data. This includes information on the purposes for processing your data, the retention periods, and who it will be shared with.
2. **Right of Access.** You have the right to access your Personal Data and supplementary information. This allows you to be aware of and verify the lawfulness of the processing.
3. **Right to Erasure.** You have the right to have your Personal Data erased in certain circumstances, also known as deletion or the “right to be forgotten”.
4. **Right of Rectification.** You have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
5. **Right to Restrict Processing.** You have the right to request the restriction or suppression of your Personal Data under certain conditions.
6. **Right to Data Portability.** You have the right to obtain and reuse your Personal Data for your own purposes across different services. This allows you to move, copy, or transfer Personal Data easily from one IT environment to another in a safe and secure way.
7. **Right to Object.** You have the right to object to the processing of your Personal Data in certain circumstances. This includes direct marketing, processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority, and processing for purposes of scientific/historical research and statistics (if applicable).
8. **Rights Related to Automated Decision Making and Profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Additionally, if you are a Healthcare Provider, you have the option to opt-out of data sharing via third party data providers, such as the American Medical Association.



If you have any questions or want to make a request regarding any of the rights listed above, please contact us by email at privacy@harmonybiosciences.com and we will respond to your request as soon as possible and, in any case, within the legal deadline established. If we receive a request from you, we may ask you to verify your identity before acting on your request to protect your Personal Data.

Lodging a Complaint; Appeals

In certain jurisdictions, you may have the right to appeal a decision Harmony has made with respect to your privacy request. To submit a privacy rights decision appeal, please email us at privacy@harmonybiosciences.com with the subject line "ATTN: Privacy Appeals," and describe the nature of your request, and the reason for requesting an appellate review.

You may also have the right to raise a complaint regarding the processing of your Personal Data with a regulatory body tasked with upholding data protection laws:

1. For the EEA, a list of the national data protection authorities can be found [here](#).
2. For the UK, the responsible data protection authority is the Information Commissioner's Office (ICO), more details about which can be found on the [ICO website](#).

We would, however, appreciate the opportunity to address your concerns, so please feel free to contact us regarding any complaint you may have. We will not discriminate against individuals for exercising their data privacy rights or filing a privacy complaint.

How to Contact Us

The Data Controller is:
Harmony Biosciences
630 W. Germantown Pike, Suite 215
Plymouth Meeting, PA 19462
United States of America.

If you have any questions or would like to submit a complaint regarding our Personal Data processing, please contact us at privacy@harmonybiosciences.com.



You can also contact our Data Protection Officer (DPO) or our European Union (EU) or United Kingdom (UK) Representatives by email at dpo@harmonybiosciences.com or by postal mail at the following locations:

DATA PROTECTION OFFICER

Harmony Biosciences
Attn: Data Protection Officer
630 W. Germantown Pike, Suite 215
Plymouth Meeting, PA 19462
United States of America

EU REPRESENTATIVE

BDO AUDIBERIA ABOGADOS Y ASESORES TRIBUTARIOS, S.L.P.
Attn: Harmony Biosciences Data Protection Representative
C/San Elies, 29-35 5ª Planta, Esc. B
Barcelona, Spain
08006

UK REPRESENTATIVE

BDO LLP
Attn: Harmony Biosciences Data Protection Representative
55 Baker Street
London W1U 7EU
UNITED KINGDOM

Changes to Our HCP Privacy Notice

We may update our HCP Privacy Notice periodically as needed to reflect our current services, policies, and practices. We will make the updated notice available on this page for your continued reference. Any changes will be effective when we post the revised HCP Privacy Notice. This HCP Privacy Notice was last updated as of the effective date listed above. We reserve the right to change the terms of this HCP Privacy Notice at any time by posting revisions to the site. You should periodically review this HCP Privacy Notice for changes. Revised or replaced documents will be retained as stated by Harmony Data Retention Policy. These must be archived and accessible if requested by legal counsel.