



Harmony Biosciences Applicant Privacy Notice

Effective Date: 04/01/2025

As the data controller, Harmony Bioscience Holdings, Inc. and all its direct and indirect subsidiaries (referred to throughout this Notice as “Harmony”, the “Company”, “we”, “our”, or “us”), are committed to protecting your Personal Data. When we use “you” or “your” in this Applicant Privacy Notice, we are referring to an individual whose Personal Data we are processing (a “data subject”).

This Applicant Privacy Notice applies to all Personal Data collected, used, shared, and otherwise processed by Harmony in connection with your application for a job or internship. We will process your Personal Data 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 and process your Personal Data. This notice does not extend to your interactions with Harmony outside the context of applying for, learning more about, or interviewing for a position, such as browsing our Careers page. For more information on how we collect and use information in those contexts, please see our Website Privacy Notice available within our [Privacy Center](#).

What is Personal Data?

For the purposes of this Applicant Privacy Notice, the term “Personal Data” means any information about an identifiable individual collected in connection with the recruitment process or otherwise as defined in accordance with applicable privacy law. When you apply for a position with us, we will request certain Personal Data about you to assess your job application. In the absence of this information, our ability to consider you as a candidate may be restricted. You may also provide us with Personal Data that we have not explicitly requested. Such information is provided voluntarily, and you determine the extent of the information you choose to share with us.

Harmony may collect the following Personal Data from you in connection with your application:

- Name, identity and contact details such as your name, address, telephone number, e-mail address and other contact data



- Username and password to facilitate your application
- Employment details such as work authorization status, details of your previous work employment including position, work experience, employment references and compensation details
- Background information such as your educational background including degrees, certificates, transcripts, credit history and/or criminal background screenings (where relevant to your application and permitted under applicable law)
- CV/ résumé, cover letter, skills and abilities, professional and other work-related licenses, permits, and certifications held
- Technical details from you about your visit to our website using “cookies” and other similar technologies. For more information, please refer to our Website Privacy Notice available within our [Privacy Center](#).
- Any other Personal Data you elect to provide to Harmony

The following Special Categories of Personal Data may be considered sensitive under the laws of your jurisdiction and may receive special protection:

- Social Security Number
- Passport and visa information, and immigration status and documentation
- Racial or ethnic origin
- Physical or mental health condition or disability status to determine appropriate workplace accommodations and evaluate fitness for a particular position
- Race or ethnic origin to comply with statutory obligations
- Previous criminal charges or convictions where relevant for the position

We kindly request that you avoid submitting any other Personal Data that may be considered sensitive under applicable laws unless it is legally required or permissible. This includes, but is not limited to, Personal Data related to:

- Biometric or genetic information
- Sexual orientation or gender identity
- Religious, philosophical, or ideological beliefs
- Political opinions
- Trade union membership, including related views and activities
- Information concerning social security measures
- Details of administrative or criminal proceedings and sanctions



There may be instances where the Personal Data you provide, such as your educational records, includes information mentioned above. By submitting such Personal Data, you explicitly authorize us to handle it for the purpose of processing your job application.

All Personal Data you submit must be accurate, complete, and not misleading. Providing inaccurate, incomplete, or misleading information may result in the rejection of your application during the selection process or disciplinary action, including immediate termination if you are already employed. It is also your responsibility that the Personal Data you submit does not infringe on the rights of any third party.

Data from Other Sources

We may obtain information about you from your references or through a background check report or from public sources or third parties in connection with your application, as allowed by applicable law. For instance, we may perform background checks through a third-party service provider and verify the information in your application related to your education, previous employment, credit, and/or criminal history, as permitted by applicable law. You may also opt to grant us access to certain Personal Data stored by external portals/websites, such as LinkedIn. By authorizing Harmony to access this information, you agree that we may collect, store, and use this information in accordance with this Applicant Privacy Notice.

How We Use Your Personal Data

The Personal Data you submit through, and we collect as part of the recruitment process will be used for Harmony's personnel recruitment, management, and planning purposes, as allowed by applicable law.

Generally, we may process Personal Data collected directly from you or about you for one or more of the following purposes. This includes:

- Processing your application
- Assessing your capabilities and qualifications for a job
- Conducting reference checks
- Responding to your inquiries and communicating with you about your application, as well as sending you information regarding this website and any changes to Harmony's terms and policies
- Complying with or monitoring compliance with any applicable law or regulation



- Conducting background checks as appropriate if Harmony offers you a position
- Preserving Harmony’s other legitimate interests, such as administrative purposes, aggregate management reporting, internal training, and general business operations
- Where the provision is required by law
- For additional purposes with your consent where such consent is required by law.

Your Personal Data will be added to Harmony’s candidate database and may be used to consider you for opportunities at Harmony beyond the one(s) for which you applied. If you do not wish Harmony to do this, please contact us at privacy@harmonybiosciences.com. We do not make any automated decisions in relation to your application without human involvement.

If you are hired by Harmony, Personal Data collected during your application may be incorporated into Harmony’s human resources system and used to manage the new-hire process; any such Personal Data may become part of your employment file and be used for other employment-related purposes in accordance with applicable law.

Disclosing Your Personal Data

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

1. **Harmony Personnel:** On a need-to-know basis, Harmony personnel will be given access to your Personal Data to execute on a given business process, such as recruiting, interviews, and candidate reviews.
2. **Third-Party Service Providers:** We may engage third-party service providers to assist with a variety of activities including hosting and operating this website, recruiting assistance, and background checks.
3. **Our Affiliates:** We may share Personal Data with our affiliates if relevant for evaluating candidates for a given position.
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.

Legal Basis under which we process your Personal Data

Our legal basis for collecting and processing your Personal Data is as follows:

- Legitimate Interests:
 - recruitment, selection, evaluation, and appointment of new employees, and
 - management and administration of the recruitment process
- Contract Performance: The processing of your personal information is mainly necessary in order to assess your employment application and is based on Article 6(1)(b) of the GDPR in the context of the employment relationship or during the period prior to the conclusion of the employment relationship.
- Legal Compliance: We may be obligated to process your Personal Data to comply with applicable law, and pursuant to Article (1)(c) of the GDPR.
- Consent. Pursuant to Article (1)(a) of the GDPR, we may process your personal information where you have given us your specific consent to do so

If the processing involves Personal Data, you provided voluntarily or is based on your consent, you have the right to withdraw your consent at any time. To do so, please contact us at privacy@harmonybiosciences.com.

Retention of Personal Data

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting requirements, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider our statutory obligations, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes we process your personal information for, and whether we can achieve those purposes through other means.



Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

If you are offered and accept employment with us, the personal information we collected during the application and recruitment process will become part of your employment record, and we may use it in connection with your employment consistent with our employee personal information policies. If you do not become an employee, or, once you are no longer an employee of Harmony, we will retain and securely destroy your personal information in accordance with our document retention policy and applicable laws and regulations.

Harmony may also retain your Personal Data to assess whether your skills align with future potential job opportunities. If you prefer that Harmony does not keep your Personal Data for this purpose, please contact us at privacy@harmonybiosciences.com.

How We Protect Your Personal Data

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 contact us at privacy@harmonybiosciences.com.

However, no transmission of information via the Internet or wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personal Data, you acknowledge that there are security and privacy limitations of the Internet which are beyond our control and accordingly, the security, integrity and privacy of data exchanged between you and us cannot be guaranteed.

International Data Transfers

Harmony Biosciences is a global organization providing services worldwide. As a result, we may process your Personal Data both in the local country where you submitted your application and through our global recruitment platform. This process may involve transferring your Personal Data to other countries with data protection standards that differ from those in your home country. However, we will use appropriate safeguards defined by applicable data protection regulations to facilitate the transfer.

If you are located in the EEA or the U.K., we will transfer your Personal Data internationally based on an adequacy decision where this is available. This is a decision made by the relevant authority such as the EU Commission declaring that the destination jurisdiction provides adequate data protection guarantees. You can find the list of adequacy decisions [here](#). However, this may vary depending on where your Personal Data is being transferred from.

Where we cannot rely on an adequacy decision, we sign relevant clauses (where appropriate) which cover these transfers and we will take all reasonable measures to safeguard your information whenever it is transferred.

Your Rights

Subject to certain conditions and applicable data protection law, you may have rights regarding your Personal Data that we collect or process:

1. **Right of Access.** You have the right to access your Personal Data and supplementary information.
2. **Right to Erasure.** You have the right to have your Personal Data erased in certain circumstances.
3. **Right of Rectification.** You have the right to have inaccurate Personal Data rectified or completed if it is incomplete.
4. **Right to Restrict Processing.** You have the right to request the restriction or suppression of your Personal Data under certain conditions.
5. **Right to Data Portability.** You have the right to obtain your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format.
6. **Right to Object.** You have the right to object to the processing of your Personal Data in certain circumstances.
7. **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.

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:

- For the EEA, a list of the national data protection authorities can be found [here](#).
- 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 Applicant Privacy Notice

We may update our Applicant 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 Privacy Notice. This Applicant Privacy Notice was last updated as of the effective date listed above. We reserve the right to change the terms of this Applicant Privacy Notice at any time by posting revisions to the site. You should periodically review this Applicant Privacy Notice for changes.