

The REMS Program Website Privacy Notice

Effective Date: October 1, 2022

Endo understands that you care about how we collect, use, and share information when you interact with our Risk Evaluation and Mitigation Strategy (“REMS”) Program websites (“Sites”) regarding our REMS Programs. We value the trust that patients, pharmacies, healthcare providers, and governmental agencies place in us. This REMS Program Website Privacy Notice (“Privacy Notice”) explains how Endo Pharmaceuticals Inc. and its affiliates and subsidiaries (“we,” “us,” “our,” “Endo”) collect, use, share, and protect personal information (“PI”) in connection with our REMS Program websites.

Please read this Privacy Notice carefully and in its entirety to ensure you fully understand our use of your PI. If you have any questions or concerns, please contact us by using the contact details in the “How to Contact Us” section of this Privacy Notice.

SCOPE

This Privacy Notice applies only to Endo’s REMS Program websites.

WHAT IS PERSONAL INFORMATION

“Personal Information” is a broad term that covers any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, to an identified or identifiable individual.

INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect PI from you in connection with your use of our Sites, when you voluntarily choose to contact us with comments or inquiries through our Sites, or when you choose to access certain areas of our Sites, including registering for training, registering with the REMS program for the Knowledge Assessment (healthcare professionals only), enrolling in the REMS Program, and/or requesting information from the REMS Program. This information may include:

- Personal identifiers, such as your name, address, email address, telephone number, other contact information, etc.;
- Professional and employment information, such as occupation and title;
- Professional identifying information, including state license information, DEA registration number, National Provider Identifier (“NPI”), etc.;
- User ID and password;
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an internet website, application, etc.; and
- Server logs, application logs, Internet Protocol (“IP”) address, etc.

Our Sites do not collect patient information, and no such information should be provided. We treat all information that you provide us as confidential.

HOW WE USE YOUR INFORMATION

We may use the PI we collect from or about you to:

- Fulfill your requests for information regarding the REMS Program;
- Assess compliance with the REMS Program;
- Conduct research related to the REMS Program;
- Verify your enrollment in the REMS Program;
- Contact you on REMS Program related matters;
- Help us understand trends, website performance, reporting or data analytics;
- Analyze aggregate data internally or share it with others such as the US Food and Drug Administration (FDA);
- Help with customer and troubleshooting support; and
- Send communications to you via email or fax, surveys, audits, Program communications, etc.

HOW WE SHARE YOUR INFORMATION

The REMS Program does not sell PI about you to third parties. We may share your PI with:

- Our affiliates or subsidiaries;
- Our contractors, service providers, and other third parties to assist in the administration, processing, and management of certain activities pertaining to the REMS Program and our Sites;
- Individuals or companies employed by Endo to carry out specific services, functions, or consultancy work;
- Regulatory bodies to whom we are obliged or required to disclose information, including the US Food and Drug Administration (FDA), Courts and Court-appointed persons;
- Legal and medical practitioners;
- Potential purchasers or bidders in connection with any proposed merger, acquisition, or any form of sale or transfer of our assets;
- Law enforcement or other government agencies to respond to subpoenas, court orders, or legal process, requests for cooperation, to establish or exercise our legal rights or defend against legal claims. In such cases, we may raise or waive any legal objection or right available to us; and
- Other support service providers necessary to assist Endo with the above.

HOW WE PROTECT AND STORE INFORMATION

Endo deploys administrative, physical, and technical safeguards intended to help protect the confidentiality of your PI, including security to protect against unlawful or unauthorized processing of PI, and against the accidental loss of, or damage to, your PI. Unfortunately, however, no safeguards are foolproof.

You are responsible for maintaining the security of your account credentials and other authentication involved in the REMS Program. Unauthorized access to password-protected or secure areas is prohibited and may lead to criminal prosecution. We may suspend your use of all or part of our Sites without notice if we suspect or detect any breach of security. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

We securely store your PI in a centralized database, with controlled access to such database. Access to PI is restricted to individuals who have a legitimate and justifiable reason to view such information. We store and retain information for as long as necessary to fulfill the purposes for which you provided the information, to comply with legal obligations, to resolve disputes, to enforce our agreements with you, and for similar essential purposes.

PERSONAL INFORMATION RETENTION

PI will be stored for as long as required to satisfy the purposes outlined in this Privacy Notice or for as long as we have a legitimate interest for which it was collected, unless a longer period is necessary for our legal obligations or for the exercise or defense of legal claims.

Our retention practices are reviewed and updated from time to time in line with legal requirements and best practices.

YOUR RIGHTS UNDER APPLICABLE DATA PROTECTION LAWS

Depending on the jurisdiction where you reside, you may have certain privacy rights regarding your PI under applicable data protection or privacy laws. If you would like to exercise your rights to access, delete, and/or correct your PI that you have provided to us, you may contact us as indicated in the “How to Contact Us” section. Please include your full name, mailing address, email address, phone number, date of birth (month, day), and type of request (i.e., Request to Access, Request to Delete). We will respond to your request in accordance with the requirements of applicable data protection and privacy laws.

We may request additional information from you to verify your identity and confirm that the request is valid. The information we require may vary depending on your relationship to us. If we are unable to verify your identity using this process, we will provide you with an explanation and describe additional steps you may take to assist us in attempting to verify your request.

If you request deletion of your PI, we will assess the request to confirm whether there are any reasons for which we are required to retain the information about you, including for specific business purposes, to fulfil a legal obligation, or other reasons permitted under the law. If we are not able to service your deletion request, we will provide you with an explanation.

THIS WEBSITE IS INTENDED FOR US RESIDENTS ONLY

The use and content of our Site is intended for US residents only. This Privacy Notice is intended to apply to collection of information from residents of the United States. If you are not a resident of the United States, please be aware that your information may be transferred to, stored, and/or processed in the United States.

YOUR CONSENT AND CONTROLLING THE USE OF YOUR INFORMATION FOR PROGRAM COMMUNICATIONS

By using the REMS Site, you agree to the terms of this Privacy Notice. Whenever you submit information to us through the Site, you consent to the collection, use, and disclosure of that information in accordance with the REMS program requirements, including agreeing that we may contact you through a variety of means such as email, postal mail, phone, etc. Endo does not use your PI for marketing

purposes; however, we may contact you for REMS related purposes (i.e., program enrollment, noncompliance, etc.).

You may instruct Endo to stop sending you communications. To opt-out, please submit a request by using the contact details in the “How to Contact Us” section of this Privacy Notice. Endo may, however, continue to communicate with you if you have submitted your PI to us for other reasons (i.e., “contact us” form on our Enterprise Website).

DATA COLLECTION TECHNOLOGY

We use data collection technology to collect information about you and your use of our Sites. Data collection technology deployed through the Site may include cookies and web beacons. This site is administered by our third-party REMS Administrator.

A cookie is a small text file that is sent to or accessed from your web browser or your computer’s hard drive. A cookie typically contains the name of the domain (Internet location) from which the cookie originated, the “lifetime” of the cookie (when it expires), and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history, and activities conducted while using the Site. A web beacon (also called a pixel tag or clear GIF) is a piece of computer code that enables us to monitor user activity and website traffic. (To learn more about cookies and web beacons, visit www.allaboutcookies.org.) Data collection technology helps improve functionality and determine which features users prefer by collecting information about your browser type, domain name of your Internet service provider, websites visited before and after visiting the Site, and web pages viewed. We may compile statistics about use of the Site to help us analyze technical and navigational information about the Site and to detect and prevent fraud.

Your Control of Cookies: Some web browsers (including some mobile web browsers) provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your device. To learn more, visit www.allaboutcookies.org/how-to-manage-cookies. Although you are not required to accept cookies or mobile device identifiers, if you block or reject them, you may not have access to all features available through the Site. For more information about how to opt out of cookies, visit www.allaboutcookies.org.

Do Not Track: Some web browsers (including Safari, Internet Explorer, Firefox, and Chrome) incorporate a “Do Not Track” (“DNT”) or similar feature that signals to websites that a user does not want their online activity and behavior tracked. If a website that responds to a particular DNT signal receives the DNT signal, the browser can block that website from collecting certain information about the browser’s user. Not all browsers offer a DNT option, and DNT signals are not yet uniform. For this reason, many website operators, including Endo, do not respond to DNT signals.

LINKS TO OTHER WEBSITES AND SERVICES

The Site may include links to third-party websites and services that are not operated by us. When you click these links, you are navigating away from the Site. A link to a third-party website or service does not mean that we endorse it, or the quality or accuracy of information presented on it. If you decide to visit a third-party website or service, you are subject to its privacy practices and policies, not ours. This Privacy Notice does not apply to any PI that you provide to these other websites and services.

THESE SERVICES ARE NOT FOR CHILDREN

The Site is not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children’s Online Privacy Protection Act, if we learn that we received any information directly from a child under age 13 without their parent’s verified consent, we will use that information only to inform the child (their parent or legal guardian) that the child cannot use the Site.

If you are a parent or guardian of a minor who has provided information without your knowledge or consent, you may submit a request to remove the minor’s information by emailing us at privacy@endo.com.

CHANGES TO THIS PRIVACY NOTICE

The Effective Date of this Privacy Notice is set forth at the top of this webpage. We reserve the right to change our Privacy Notice as business needs or applicable laws require. If Endo makes material changes to the way we use PI, we will update the “Effective Date” at the beginning of this notice. We recommend that you check the current version available from time to time. Your continued use of our Site after the Effective Date of the revised Privacy Notice constitutes your acceptance of the revised Privacy Notice. The revised Privacy Notice replaces and supersedes all previous versions.

HOW TO CONTACT US

If you have any questions about this Privacy Notice or about how Endo uses your PI, please contact us at privacy@endo.com or by regular mail at:

Endo International Inc.,
Attn: Privacy, Legal Department
1400 Atwater Drive
Malvern PA 19355