

MALLINCKRODT PRIVACY NOTICE FOR HEALTHCARE PROFESSIONALS

At Mallinckrodt, we recognize that the privacy and security of your information is important to you. This Privacy Notice for Healthcare Professionals (“HCPs”) (“**Notice**”) describes how Mallinckrodt Pharmaceuticals Ireland Limited and its affiliates (“Mallinckrodt,” “we,” “us”) collect and use your personal data online, including when you visit our websites (the “Sites”), and interact with us offline. This Notice informs you of your rights with respect to your personal data in accordance with applicable data protection and privacy laws.

The Mallinckrodt affiliated entity that you contract with, or that otherwise is the entity with which you have a business relationship, is the controller of your personal data for purposes of applicable data protection and privacy laws.

What is personal data?

Personal data is any information about you that enables you to be identified. As used in this Notice, personal data means data that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

Notice at Collection: Personal data we collect:

We collect the following categories of personal data about HCPs:

- **Personal identifiers:** name, address, telephone number, email address, National Provider Identifier (NPI), identifiers developed by third parties operating in the HCP environment, IP address;
- **Characteristics of protected classes and demographic information:** military or veteran status, age (over 40);
- **Commercial and financial information:** payment information, account information, and details of any financial relationship with us, inquires or requests for assistance regarding our products or services;
- **Professional or employment-related information:** name of your practice, academic background, professional designation, medical specialty, licensing and disbarment status, publications and information about public speeches, and additional personal data you provide in your curriculum vitae or other similar documents or communications;
- **Education information:** academic background and credentials;
- **Internet or electronic network information:** your browser type, operating system, domain names visited, click activity, referring websites, the date and time and length of visit of your visit to our Sites or other websites or mobile applications;
- **Audio information:** recordings of calls made to our information and support lines; and
- **Inferences drawn from any above data to create profile reflecting** a health care professional’s interest as they relate to the types of products and educational offerings provided by Mallinckrodt.

We collected the foregoing categories of personal data in the 12 months preceding the date of this Policy.

Notice at Collection: Purposes for collection of personal data

We collect and otherwise process your personal data, and may have previously processed your personal data for the following purposes:

- Facilitating your registration and attendance at events we sponsor
- Providing you with promotional information about our products and events
- Providing you with scientific information about our research and products
- The administration of advisory boards and other committees that we convene
- Coordinating your participation as a speaker at events we sponsor, including any compensation or honorarium
- Responding to your inquiries about our products, policies and programs
- Processing patient requests to participate in programs we offer or administer
- Satisfaction of our reporting obligations under applicable law or by virtue of our membership in industry certification organizations

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Notice at Collection: Categories of personal data we sell or share

When we engage in digital advertising, we may sell the following categories of personal data (according to the broad definition of “sell” under select US state privacy laws) or share them for purposes of cross-context behavioral advertising: personal identifiers and internet or other electronic activity information.

These categories of personal data are sold to or shared for cross-context behavioral advertising with advertising networks and other companies that facilitate digital advertising or provide analytics or measurement information about our Sites and products. We engage in such sales and sharing to understand and analyze the use of our Sites and to facilitate digital advertising to provide HCPs with information about products and services in which they may be interested. We do so by allowing third parties to place cookies or other tracking technologies on our Sites.

For information about how to opt out of such uses, please see the Cookies and Analytics – Automatic Collection section below.

We do not sell or share for cross-context behavioral advertising any of the other categories of personal data we collect.

Notice at Collection: Retention periods

We retain personal data for as long as it is necessary and relevant for our business. The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide / receive the services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the personal data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation or data that must be retained for the purposes of litigation or disputes).

Sources from which we collect personal data

We collect personal data from you when you attended or registered to attend an event sponsored by us; when you participated in one of our advisory boards or spoke at an event on our behalf; when you requested information from us about our products; when you applied for a grant, donation or sponsorship; when you responded to one of our surveys; or otherwise when you interacted with us. We may have also collected your personal data from patients, other HCPs or medical professionals, dispensing entities, from data brokers specializing in HCP data, and from publicly available sources. We will continue to collect personal data from these same types of sources.

HCPs or Mallinckrodt Affiliated Entities in the EEA/UK – legal grounds of processing

If you are an HCP in the European Economic Area (“EEA”) / UK or the controller of your personal data is in the EEA/UK (see above), the following chart provides additional information about our legal grounds for processing your personal data:

- **Where you register to attend and/or attend a sponsored event:**

Categories of Personal Data	Purpose for Processing	Legal Grounds of Processing
Personal identifiers	The administration and conduct of the relevant event, including to respond to your enquiries and communicate with you about the event.	Where we have a legitimate interest to ensure the effective administration and conduct of the relevant event (Article 6(1)(f), GDPR).

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<p>Personal identifiers</p>	<p>To invite you to future events and to send you other promotional information about our products (where permitted by law).</p> <p>If you wish to stop receiving marketing or market research communications from us, you can unsubscribe via the link at the bottom of the relevant e-mail or contact us using the <u>contact details below</u>.</p>	<p>If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent (Article 6(1)(a), GDPR).</p> <p>In other instances, we will send marketing communications to you where this is in our legitimate interest (Article 6(1)(f), GDPR).</p>
	<p>The storage of your personal data in databases for use when sending invites to future events.</p>	<p>Where we have a legitimate interest to manage our business and the conduct of future events (Article 6(1)(f), GDPR).</p>
	<p>Compliance with and satisfaction of legal obligations and regulatory requirements for purposes of financial reporting / public disclosure obligations in relation to agreements with and/or payments and benefits to healthcare professionals and healthcare organizations.</p>	<p>To comply with a legal obligation (Article 6(1)(c), GDPR and national laws).</p> <p>Where we have a legitimate interest to comply with applicable transparency reporting obligations (including, those in the United States) (Article 6(1)(f), GDPR).</p>

- **Where you participate in a Mallinckrodt advisory board:**

Categories of Personal Data	Purpose for Processing	Legal Grounds of Processing
	<p>The administration and conduct of the relevant advisory board, including to respond to your enquiries and communicate with you about the advisory board.</p>	<p>Where we have a legitimate interest to ensure the effective administration and conduct of the advisory board (Article 6(1)(f), GDPR).</p>
	<p>The storage of your personal data in databases for use when selecting healthcare professionals for future advisory boards.</p>	<p>Where we have a legitimate interest to manage our business and the conduct of future advisory boards (Article 6(1)(f), GDPR).</p>

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	Compliance with and satisfaction of legal obligations and regulatory requirements in the context of safety data reporting activities, and for purposes of financial reporting / public disclosure obligations in relation to agreements with and/or payments and benefits to healthcare professionals and healthcare organizations	To comply with a legal obligation (Article 6(1)(c), GDPR and national laws). Where we have a legitimate interest to comply with applicable transparency reporting obligations (including, those in the United States) (Article 6(1)(f), GDPR).
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- **Where you are engaged to speak on our behalf:**

Categories of Personal Data	Purpose for Processing	Legal Grounds of Processing
Personal identifiers	The administration and conduct of the relevant event, including to respond to your enquiries and communicate with you about the event.	Where we have a legitimate interest to ensure the effective administration and conduct of the relevant event (Article 6(1)(f), GDPR).
Personal identifiers	Meeting our contractual obligations under the speaker agreement with you.	Where necessary for performance of a contract (Article 6(1)(b), GDPR).
Personal identifiers	The storage of your personal data in databases for use when selecting speakers for future events.	Where we have a legitimate interest to manage our business and the conduct of future events (Article 6(1)(f), GDPR).
Personal identifiers	Compliance with and satisfaction of legal obligations and regulatory requirements for purposes of financial reporting / public disclosure obligations in relation to agreements with and/or payments and benefits to healthcare professionals and healthcare organizations.	To comply with a legal obligation (Article 6(1)(c), GDPR and national laws). Where we have a legitimate interest to comply with applicable transparency reporting obligations (including, those in the United States) (Article 6(1)(f), GDPR).

- **When you contact us:**

Categories of Personal Data	Purpose for Processing	Legal Grounds of Processing
Personal identifiers	To respond to your enquiries and communicate with you including, where these relate to, for example, requests for funding, grants, early access programs (“EAPs”).	Where we have a legitimate interest to manage our business, and to process and respond to your communications (Article 6(1)(f), GDPR).

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Audio information	To make and use recordings of calls made to our information and support lines	Where we have a legitimate interest to manage our business, and to process and respond to your communications (Article 6(1)(f), GDPR).
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No use or disclosure of sensitive personal data

We do not use or disclose HCP sensitive personal information as defined in the California Consumer Privacy Act to create profiles about or infer characteristics about HCPs.

Disclosure of personal data for business purposes in the past 12 months

The following chart describes the categories of personal data we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of Data Information	Categories of Third Parties to Which We Disclosed Personal Data for Business Purposes
Personal identifiers: name, address, telephone number, email address, National Provider Identifier (NPI), identifiers developed by third parties operating in the HCP environment, IP address.	Service providers that manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide analytics information, and provide legal and accounting services.
Protected class information: military or veteran status; age (over 40).	Service providers that manage customer information and provide patient support services.
Commercial and financial information: payment information, account information, and details of any financial relationship with us, inquiries or requests for assistance regarding our products or services.	Service providers that manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide market research and analytics information, and provide legal and accounting services.
Professional or employment-related information: name of your practice, academic background, professional designation, medical specialty, licensing and disbarment status, publications and information about public speeches, and additional personal data you provide in your curriculum vitae or other similar documents or communications.	Service providers that manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide market research and analytics information.
Education information: academic background and credentials.	Service providers that manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide market research and

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Categories of Data Information	Categories of Third Parties to Which We Disclosed Personal Data for Business Purposes
	analytics information.
Internet or electronic network information: your browser type, operating system, domain names visited, click activity, referring website and the date and time and length of visit of your visit to our Sites or other websites or mobile applications.	Service providers that manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide market research and analytics information.
Audio information: recordings of calls made to our information and support lines.	Service providers that manage customer information and provide patient support services,
Inferences drawn from any above data to create profile reflecting a health care professional's interest as they relate to the types of products and educational offerings provided by Mallinckrodt.	Service providers that manage customer information and provide patient support services, advertise and market our products and services, provide market research and analytics information.

Business purposes for disclosures

We disclosed the aforementioned categories of personal data to the categories of third parties identified above for the following purposes: to manage customer information and provide patient support services, facilitate email communications, provide security services and cloud-based data storage, host our website and assist with other IT-related functions, advertise and market our products and services, provide analytics information, and provide legal and accounting service.

We may also disclose HCP personal data with Third parties we consult and engage as part of our clinical research and compliance activities, such as research partners, ethics committees, and professional advisors, and clinical research monitors and research organizations. We may also disclose your personal data when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and the property or the rights, property or safety of others, including to regulators and supervisory authorities, including governmental and non-governmental regulators and ombudsmen and pharmaceutical industry associations as requested; law enforcement agencies; and judicial authorities. We may also disclose your personal data when we have a legitimate interest in making a disclosure, such as where necessary to protect our rights and property or to comply with a subpoena or similar legal process or government request. We may disclose or transfer your personal data to a third party in the event of an actual or proposed (e.g., during due diligence) merger, acquisition, reorganization of our organization or other restructuring.

Cookies and Analytics – Automatic Data Collection

We may use cookies, pixel tags, web beacons and other similar tracking technologies (“tracking technologies”) to automatically collect information through our Sites. Tracking technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that record certain pieces of information when you visit our website. We may use these tracking technologies to help identify irregular behavior, prevent fraudulent activity and improve security, as well as making it possible for you to save your preferences and help us understand how you interact with our website.

We also allow third parties to use tracking technologies on our Sites for analytics, ad measurement services, and the targeting and delivery of advertisements. Some of these third parties are our service providers who assist in helping display advertisements, tailor advertisements to your interests, improve your experience on our Sites, including by determining if you require assistance or are having problems

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navigating on our Sites. Other third parties use the tracking technologies to collect information about how you interact with other websites and advertisements across the Internet to provide advertising, including our advertisements, that is tailored to your interests, and which may appear on our Sites or on other website or platforms. The technologies and information collected by these third parties.

Opt-Out Options

Many web browsers allow you to block certain tracking technologies, such as cookies. You can disable cookies on your browser by following the instructions on your browser. Additionally, the Digital Advertising Alliance (DAA) and the Network Advertising Initiative (NAI) both have tools that allow you to identify which members of each organization may be using third-party tracking tools to facilitate interest-based advertising on your browser or mobile device, and to select which members you would like to direct not to use your data for such advertising purposes. For more information, consult the DAA's opt-out information page at youradchoices.com or the NAI's opt-out information page at <https://optout.networkadvertising.org>. Please note these tools are operated by the DAA and NAI; we are providing this information as a courtesy. As such, we are not responsible for the operation of such tools, including their functionality or accuracy.

Google Products

We use Google Analytics to evaluate and analyze the use of our website and other related Google products and features, including Google Signals, remarketing to you by email, cross-device tracking, each of which leverages information obtained through Google tracking technologies on our Sites and information Google may have independently collected about you. Google Analytics also uses cookies and similar technologies to collect information, such as how often users visit a Site, what pages they visit when they do so, and what other websites they visited prior to visiting our Sites. For information about Google's privacy practices, please refer to the Google Privacy Policy: <https://policies.google.com/privacy?hl=en-US#infocollect>. Google provides an opt-out browser add on that it represents provide individuals who visit websites using Google Analytics with the ability to direct Google not to use their data for Google Analytics. The tool can be accessed here: <https://tools.google.com/dlpage/gaoptout/>. We make no representations about the functionality or accuracy of this tool, as it is provided by and operated by Google.

Personal data of minors

The Sites and other HCP-related data processing activities are not directed to minors. As such, we do not knowingly sell or share for purposes of behavioral advertising the personal data of minors, including minors under 16 years of age.

Third party websites

Our Sites may contain links to third party websites, including social media buttons that link to social media platforms. This Notice does not govern how those third parties or social media platforms collect or use personal data and we do not endorse or have control over their practices. The privacy policies and terms of use for those third parties' websites/apps or social media platforms govern those companies' privacy practices. We are not responsible for the content or privacy practices of any third-party websites or platforms.

Where do we store your personal data?

For the purposes listed above, we may transfer some or all of your personal data to other countries outside of your home country where different data protection rules apply and which may not provide the same level of data protection and judicial redress as in your home country. Details of the countries in which the recipients are located are available on request.

If you are located in the EEA/UK, such transfers will be made only to those countries where the European Commission has issued an adequacy decision or, in its absence, in reliance on EU-style data transfer agreements (so called "**Standard Contractual Clauses**"), which may require the recipient to put in place supplementary measures to ensure an essentially equivalent level of protection is provided, as in the EEA/UK. You may obtain further information and a copy of the

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relevant data transfer mechanisms that we have in place by contacting us.

What are your rights?

EUROPEAN PRIVACY RIGHTS

Depending on where you live, you have the following data protection rights which are subject to certain limitations:

- The right to be informed about our collection and use of your personal data.
- The right to access the personal data we hold about you.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- The right to be forgotten (erasure), i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- The right to restrict (i.e., prevent) the processing of your personal data.
- The right to data portability i.e., if you have provided personal data to us directly, and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- The right to withdraw your consent to or object to the processing of your personal data.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after receipt of your request. In exceptional cases, we may extend this period by two months, and we will tell you why. We will request proof of identification to verify your request. For more details in relation to your rights, including how to exercise them, please contact us.

You also have the right to lodge a complaint with the Data Protection Authority in your country regarding the processing of your personal data.

You may have a right to review any collected personal data before we report or publish such personal data for transparency reporting purposes. Information already reported or otherwise disclosed will not be deleted.

CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may have separate rights regarding your personal data, in accordance with California law.

California Consumer Privacy Act. The California Consumer Privacy Act (the “CCPA”) grants California residents (referred to herein as “consumers”) certain rights with respect to their personal data, including, as described below, the right to know about, delete, and if applicable, opt-out of the sale of their personal data. These rights are subject to certain limitations; where they apply, to a request you submit, we will provide you with an explanation.

Right to know. You have the right to know what information we have collected about you, the categories of information we have shared and with whom, in the last 12 months from the date of this policy. Please refer to the sections above for this information.

Right to request disclosure of information we collect or disclose about you. You can submit a request to us for the following information regarding the personal data we have collected about you in the 12 months prior to our receipt of your request (a “request to know”):

- The categories of personal data we have collected.
- The categories of sources from which we collected the personal data.
- The business or commercial purposes for which we collected the personal data.
- The categories of third parties with which we shared the personal data.

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- The categories of personal data we disclosed for a business purpose, and for each category identified, the categories of third parties to whom we disclosed that particular category of personal data.
- The specific pieces of personal data we collected.

Right to request the deletion of personal data we have collected from you. Upon request, we will delete the personal data we have collected about you, subject to exceptions provided for under relevant law.

Right to request the correction of personal data

You have the right to request that we correct personal data we hold that you believe is not accurate. We will take steps to determine the accuracy of the personal data that is the subject of your request to correct, and in doing so will consider the totality of the circumstances relating to the personal data you have identified as being incorrect. We may ask that you provide documentation regarding your request to correct to assist us in evaluating the request.

Your Right to Ask Us Not to Sell or Share Personal data We Have Collected About You

With respect to those categories of personal data that we sell to third parties or share with third parties for the purpose of cross-context behavioral advertising, you have the right to opt out of such sales and sharing.

We note that many web browsers allow you to block certain tracking technologies, such as cookies. You can disable cookies on your browser by following the instructions on your browser. Additionally, the Digital Advertising Alliance (DAA) and the Network Advertising Initiative (NAI) both have tools that allow you to identify which members of each organization may be using third-party tracking tools to facilitate such sales or sharing and to select which members you would like to direct not to use your data for such purposes. For more information, consult the DAA's opt-out information page at youradchoices.com or the NAI's opt-out information page at <https://optout.networkadvertising.org>. Please note these tools are operated by the DAA and NAI, in accordance with their policies. As such, we are not responsible for the operation of such tools, including their functionality or accuracy.

How can you make a request to exercise your rights? To submit requests to know, for a copy of your personal data, or to delete or correct, you may contact us at privacy@mnk.com or call 800-822-2075.

How we will handle a request to exercise your rights. For requests know, for a copy of your personal data, or to delete or correct, we will first acknowledge receipt of the request within 10 business days of receipt of your request. We will provide a substantive response to your request within 45 days from receipt of your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer than normal to fulfil, we will let you know.

Before providing a substantive response to such requests, we will take steps to verify your identity. These steps may include asking you for personal data, such as your name, address, or other information we maintain about you. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

You may also designate an authorized agent to submit requests on your behalf. We will require verification from the agent that you provided the authorized agent permission to make a request on your behalf. For requests other than opt-out requests, you must verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

1. A completed [Authorized Agent Designation Form](#) indicating that you have authorization to act on the consumer's behalf.

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If we do not receive the required information, your request may be denied.

We are committed to honoring your rights. If you exercise any of the CCPA rights explained in this Notice, we will continue to treat you fairly and will not discriminate against you.

Please send requests to exercise your California privacy rights to privacy@mnk.com or contact us at 800-822-2075.

How do we protect your personal data?

Mallinckrodt takes the security and privacy of your personal data very seriously. We implement appropriate security measures to protect your personal data from loss, misuse and unauthorized access, disclosure, alteration and destruction. In doing so, we take into account the risks involved in processing and the nature of such personal data and comply with applicable laws and regulations. While we take such measures to safeguard your personal data, we cannot guarantee perfect security, particularly for information transmitted over the Internet.

How do you contact us?

If you reside in the EEA, please contact us at privacy@mnk.com or Mallinckrodt Pharmaceuticals Ireland Limited, College Business & Technology Park, Cruiserath, Blanchardstown, Dublin 15, Ireland.

If you reside in the U.S., please contact us at privacy@mnk.com or call 800-822-2075.

Accessibility

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at privacy@mnk.com or call 800-822-2075.

Changes to this Notice

We may change this Notice from time to time. You will be informed about any material changes through a notice on our website.