

Global Data Privacy Policy

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Delegate Owner:	Michael Fadus, Vice President, Global Data Privacy	Domain:	Compliance & Ethics

Purpose

The purpose of this Global Data Privacy Policy is to outline our Guiding Principles on Teva's **Processing of Personal Data** and to support compliance with global privacy laws and regulations.

Scope

In Scope

- All activities that involve the **Processing of Personal Data** in all formats including electronic, hard copy, and verbal.
 - Processing includes any action that can be performed on Personal Data (for example: collection, storage, revision, deletion, correction, review, analysis, organization, consultation, combination, and transmission).
 - Personal Data includes any information in any format that can be used directly or indirectly, alone or in combination with any other information, to identify an **Individual**.
 - **Sensitive Data** includes special categories of Personal Data such as information on health, sexual orientation, and race. Certain laws impose a higher degree of care and additional requirements on the **Processing of Sensitive Data**.

Application

All **Teva Organizations Worldwide** are responsible for compliance with this Global Policy when involved in the **Processing of Personal Data**.

Teva complies with local privacy laws or agreements with **Third Parties** that may require higher standards than those in this policy.

Guiding Principles

- 1 Teva follows all **Applicable Laws and Codes** related to the **Processing of Personal Data** in the countries in which it and its subsidiaries operate. Teva also requires its **Third Parties** to adhere to Applicable Laws and Codes.
- 2 Teva designs and embeds privacy controls into its activities, processes, and technologies, as well as in relationships with Third Parties.
- 3 Teva collects and processes **Personal Data** only for a legitimate reason.
- 4 Teva identifies and minimizes **Personal Data** by only collecting or processing what is required.
- 5 Teva protects all **Personal Data**, regardless of its source, form, format, location or use. This includes the Processing of **Personal Data** from websites and apps.
- 6 Teva acts with transparency and as applicable provides notice and/or obtains **Consent** prior to the **Processing of Personal Data**.

Key Privacy Stakeholders

Activities that involve the collection and **Processing of Personal Data** must be evaluated by the Global Data Privacy Team, IT, Information Security, and the Legal Department to ensure alignment. Therefore, review and understand the Guiding Principles and approach the teams mentioned above at the early stages of activity design and development.

To ensure that Teva complies with applicable requirements and laws, involve the Global Data Privacy Team in the early stages of any initiative involving the collecting and/or Processing of Personal Data, and ensure the initiative aligns with the Guiding Principles of this Global Policy.

Processing Personal Data

Teva considers data privacy from the beginning of every project. When **Processing Personal Data**:

- Determine how to give notice and/or obtain **Consent** to collect or process **Personal Data** from any source.
- Classify **Personal Data** to determine the appropriate technical and cyber security measures.
- For the above points, ask Legal and the Global Data Privacy Team for advice.
- Conduct a Privacy Impact Assessment, as needed, in the Data Privacy compliance management tool.
- Conduct due diligence on external vendors to ensure they have appropriate data privacy controls.
- Design **Processing** of **Personal Data** to meet relevant data privacy requirements (for example: access, revision, retention).
- Ensure privacy language is in **Written Agreements**.

Direct Marketing and Communication Channels

- a. When sending marketing or other communications to individuals, including **Healthcare Professionals (HCPs)**, patients, consumers and business contacts, Teva complies with relevant laws that require obtaining notice and/or **Consent**.
- b. Local law may impose additional requirements or restrictions regarding the communication channels such as calling, text & SMS message, direct mail, push notification, electronic mail, or fax. Contact the Global Data Privacy Team and/or the Legal Department for guidance.

Third Parties

Teva ensures that **Third Parties** comply with Teva's **Global Corporate Security Policy**, **Global IT Security Policy**, **Written Agreements**, and data protection laws when collecting and/or **Processing** of **Personal Data** on Teva's behalf.

- Teva only permits **Third Parties** to process **Personal Data** on Teva's behalf for reasons consistent with the purposes for which the data were originally collected or other notified or legally authorized purposes.

- **Third Parties Processing Personal Data** on Teva's behalf may be subject to due diligence as part of the selection process in order to verify whether they have adequate privacy controls, including sufficient security measures to protect **Personal Data**
- Teva enters into **Written Agreements** with **Third Parties** involved in **Processing of Personal Data** on Teva's behalf, requiring them to comply with Teva's **Global Corporate Security Policy**, **Global IT Security Policy**, and data protection laws. Teva ensures privacy language is in **Written Agreements**.

Additional Elements of Managing Personal Data

- a. Teva restricts access to **Personal Data** to a 'need to know' basis.
- b. Teva transfers **Personal Data** (directly or via a **Third Party**) out of a country in accordance with applicable laws, for example, to a country that is recognized as having an adequate level of protection or to a country that complies with a mechanism recognized by local laws.
- c. Teva responds as required under applicable law to an **Individual** exercising a right regarding access to, or correction, restriction, or deletion of Personal Data, or revocation of **Consent** (or opt-out) or objection to Teva's **Processing of Personal Data**.
- d. Teva is committed to safeguard **Personal Data** in accordance with Teva's **Global Corporate Security Policy**, **Global IT Security Policy**, and applicable local laws. This reduces the risks of loss or unauthorized access, destruction, use, modification, or disclosure of Personal Data.
- e. Teva retains **Personal Data** in accordance with local law and Teva's **Global Records and Information Management (RIM) Policy**.

Privacy and Data Protection Authorities

Teva notifies or registers with relevant privacy and data protection authorities and obtains the necessary approvals, in accordance with local law.

Breach and Incident Response

Teva handles any privacy incident and/or breach (potential or confirmed) in accordance with Teva's **Global Data Privacy Incident and Breach Reporting Policy & Procedure**.

Global Data Privacy Team

Europe Privacy and Global Activities: EUPrivacy@tevaeu.com
International Markets Privacy: IMPrivacy@tevapharm.com
North America Privacy: USPrivacy@tevapharm.com

Resources

Name of Resource	Location of Resource
Global Corporate Security Policy	MyTeva intranet
Global Data Privacy Incident and Breach Reporting Policy & Procedure	MyTeva intranet
Global IT Security Policy	MyTeva intranet
Global Records and Information Management (RIM) Policy	MyTeva intranet

Glossary

- **Applicable Laws and Codes** – The international, regional, national, and local laws, regulations, competent authorities' decisions and guidelines, and industry codes governing the activity or interactions, which may include those of the country where the Teva entity responsible for the activity is located, where the activity or interaction takes place, where the Data Subject resides and/or where the Healthcare Professional (HCP) practices their profession.
- **Consent** – A legally binding expression of will, given voluntarily, in which the Data Subject signifies his/her agreement to the Processing of Personal Data.
- **Healthcare Professional (HCP)** – A member of the medical, dental, pharmacy, and nursing professions and any other individuals who, in the course of their professional activity, are qualified or permitted to prescribe, supply, administer, purchase, recommend, reimburse, pay for or acquire a medicine, or influence or authorize any of the foregoing. The term also

includes health service managers and administrative or clinical support staff who provide support to HCPs, as well as any employees of any entity that is owned by or comprised of HCPs. Examples of HCPs include physicians, nurses, medical assistants, pharmacists, paramedics, product formulary committee members, clinical investigators, and public and private hospital employees.

- **Individual** – The person who is or could be identified by the Personal Data.
- **Personal Data** – Information in any format that can be used, directly or indirectly, alone or in combination with any other information, to identify a person.
- **Processing** – Any action that can be performed on Personal Data, for example, collection, storage, revision, deletion, correction, review, analysis, organization, consultation, combination, and transmission.
- **Sensitive Data** – A special category of Personal Data defined by local, national, and/or regional law that often includes information about, for example, someone’s health or sex life, race or ethnic origin, religious or political beliefs or affiliations, labor or trade union membership, national identification numbers, bank account or credit card numbers, and criminal offenses.
- **Teva Organizations Worldwide** – Teva Pharmaceutical Industries Ltd. and its subsidiaries and affiliates in which Teva holds, directly or indirectly, 50% or more of outstanding equity interest, voting power, or rights to appoint at least one of the directors and managers.
- **Third Party** –
 - Anyone who is not a Teva employee (including former Teva employees); or
 - Any entity that does not qualify as part of Teva Organizations Worldwide and:
 - is active in the pharmaceutical industry environment; or
 - Has a relationship to Teva that is active (currently conducting business with Teva), or has been inactive for less than 3 years.
 - A Third Party would include Teva’s vendors, customers, business partners or any other party that interacts with Teva.
- **Written Agreement** – A document in a form approved by Teva’s Legal department such as a contract, appendix, signed statement, or amendment to a contract.