

EU-U.S. Privacy Shield Policy

Effective Date: March 26, 2019

Teva Pharmaceuticals USA, Inc. and Teva Branded Pharmaceutical Products R&D, Inc. (collectively referred to as “Teva” hereinafter) respect your privacy and are committed to protecting personal data. Teva participates in the EU-U.S. Privacy Shield Framework regarding the collection, use, and retention of personal data that Teva receives in the United States from the European Union and the United Kingdom.

This Privacy Shield Policy sets forth Teva’s practices with respect to personal data it receives in the United States from the European Union (EU) and the United Kingdom in reliance on the Privacy Shield Framework. If there is any conflict between the terms of this policy and the Privacy Shield Framework, the Privacy Shield Framework applies.

To learn more about the Privacy Shield Framework please visit www.privacyshield.gov. And to view our certification, you can check the [Privacy Shield List](#).

Collection and Use of Personal Data

Employee Personal Data

We collect personal data from and about contingent workers, employees, former employees, and prospective employees. This can include someone’s name, contact information, social security or government-issued identification number, financial information, education and employment history, information about one’s family (spouse and dependents, for example), training records, job title, grievance information, employment agreements, and job performance and development.

Our primary purpose in collecting and processing such information is to carry out the employment relationship and for recruitment purposes. This includes but is not limited to payment, compensation planning and related transactions, providing and managing benefits, performance management, career development, training, staffing, considering candidates for open positions, personnel safety and security issues, headcount reporting, data analysis and reporting, travel and meetings management, grievance resolution, technology support, and employee communications. We also process and transfer such personal data for the purposes of conducting legal, audit and regulatory compliance activities.

Study Investigator Data

We collect personal data about study investigators and other individuals who work on clinical trials and studies. This can include someone’s name, title, professional licensure information, curriculum vitae (CV), contact information, current and previous employment and education information, experience in clinical research, training and qualifications, details of payments or transfers of value that we make to you, or other information relevant to conducting a study.

We collect and process this information for the purposes of planning, implementing and administering clinical trials and studies, internal recordkeeping and management, to contact study investigators and study staff as necessary over the course of a clinical trial or study, to make disclosures in accordance with applicable laws and regulations, and for compliance with applicable laws and protection of our

legitimate business interests and legal rights. We also process and transfer such personal data for the purposes of conducting legal, audit and regulatory compliance activities.

Customer and Other Personal Data

We collect personal data in connection with Teva's business activities, including offering and managing our products, services and programs. This information can include name and contact information as well as information on demographics, health and wellness, healthcare or medication, inquiries or feedback about our products and programs, and preferences.

We collect and process this information in order to provide requested products, services or programs; to personalize product information or provide additional information about our products and programs; to optimize or improve our products, programs, and operations; to manage customer information and systems across Teva programs and platforms; to conduct market research; to support research and development, including clinical research and for quality, safety and efficacy monitoring and reporting. We also process and transfer such personal data for the purposes of conducting legal, audit and regulatory compliance activities.

Sharing of Personal Data

We may share personal data with affiliates, agents, contractors, or business partners so that they may perform services for us. Teva remains liable under the Privacy Shield Framework if the third-party handles personal data in a manner inconsistent with the Framework, unless Teva proves that it is not responsible for the third-party's activities.

We may also share personal data with third parties if the disclosure is necessary to protect or defend Teva's legal interests, including but not limited to defending or prosecuting a lawsuit or administrative proceeding, to prevent fraud, to comply with an investigation of suspected or actual illegal activity, or to comply with any statute, law, rule or regulation.

In addition, we may disclose personal data (i) as required by law or in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, (ii) as incident to or in preparation for a corporate sale, merger, reorganization, dissolution, bankruptcy, or similar event, (iii) under circumstances we believe reasonably necessary to protect the personal safety of users of Teva products, services and programs, or the public, or (iv) as is otherwise described in this policy.

Your Rights and Choices

Under the Privacy Shield Framework and this policy, you have the right to request access to personal data about yourself and to request limitations on how Teva uses or discloses personal data about you. With our Privacy Shield certification, Teva has committed to respect these rights. To exercise these rights, please contact us as indicated in the "How to Contact Us" section of this policy. We will respond to such requests within a reasonable timeframe.

Privacy Shield Inquiries or Complaints

You can contact us with any Privacy Shield related inquiry or complaint.

If you have a complaint involving employee personal data as described above, you may contact the Data Protection Authority (DPA) in your country. The list of DPAs in the European Union is available here (http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). Teva agrees to cooperate with the DPAs in the European Union and the United Kingdom and comply with the advice of such authorities with regard to employee personal data.

For complaints that do not involve employee personal data and that have not been resolved satisfactorily with Teva directly, you can contact our U.S.-based third party dispute resolution provider, free of charge, at <https://feedback-form.truste.com/watchdog/request>.

As further explained in the Privacy Shield Framework, a binding arbitration option will also be made available to address complaints not resolved by any other means. Teva is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC).

How to Contact Us

If you have any questions or concerns regarding this policy, please contact us at:

Teva Pharmaceuticals
c/o Compliance Department
Attn: Privacy Officer
Morris Corporate Center III
400 Interpace Parkway
Parsippany, New Jersey 07054

Updates to Policy

This policy may be amended from time to time, consistent with the Privacy Shield Framework. Any changes or modifications will be effective upon posting of the revisions on Teva's website. In addition, we will make employees aware of changes to this policy by posting to our intranet, through email, or by other means.