

AVADEL PRIVACY POLICY AND CONSUMER HEALTH DATA PRIVACY POLICY

Introduction

Avadel CNS Pharmaceuticals, LLC and its affiliates (“we,” “our,” or “us”) respects the privacy of your information. This U.S. Online Privacy Policy (“Privacy Policy”) is designed to assist you in understanding how we collect, use, share, and safeguard your information. This Privacy Policy applies to individuals who access our websites (“Sites”) and the services provided through our Sites (collectively, “Services”).

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically. Washington and Nevada residents looking for information relating to our collection and processing of their consumer health data should refer to our Consumer Health Data Privacy Policy as detailed below.

This Privacy Policy covers the following topics:

- Personal Data We Collect
- How We Use Your Personal Data
- How We Share Your Personal Data
- Cookies and Other Tracking Technologies
- “Do Not Track” Signals
- Choices About Your Personal Data
- Security
- Third-Party Links
- Children’s Privacy
- Notice to Nevada Residents
- Notice to California Residents
- Accessibility
- How to Contact Us

Personal Data We Collect

We collect personal data from you through your use of the Sites and Services. Personal data is information that is linked or reasonably linkable to an identified or identifiable individual. We collect the following types of personal data:

Personal Data You Provide

We may collect the following personal data that you voluntarily provide to us in using our Sites and Services:

- Sign Up for Updates and Resources. If you sign up to receive updates and additional information from us as a patient, you will provide us with your name, email address, zip code, date of birth, gender, and health information. If you sign up to receive updates and additional information from us as a healthcare professional, you will provide us with name, email address, and occupational information (e.g., occupational specialty, NPI number).
- RYZUP™ Support Services. If you submit an enrollment form for our RYZUP™ Support Services as a patient, you will provide us with your name, date of birth, gender, mailing address, and phone

number, and you may choose to provide us with your email address and cell phone number. If you sign up for our Patient Assistance Program, you will also provide us with your household size and income, citizenship status, and insurance coverage information. During the enrollment process, you may also be required to provide us with supporting documentation (e.g., insurance cards, proof of income, approval/denial letters, prior authorization).

- Avadel Medical Affairs Resource Center. If you request access to the Avadel Medical Affairs Resource Center research, you will provide us with your name, email address, state, occupational information (e.g., degree, occupational specialty, occupational institution/office), and any other information you choose to include in the form.
- Request an Avadel Representative. If you request a representative on our healthcare professional Site, www.LumryzHCP.com, you will provide us with your name, NPI number, state, zip code, and email address.
- Grant Applications. If you submit an application to receive a grant, you will provide us with your name, email address, mailing address, phone number, occupational information (e.g., professional title, occupational institution), and organization's tax identification number.
- Investigator-Initiated Studies. If you submit an investigator-initiated study proposal, you will provide us with your name, phone, email address, office mailing address, and occupational information (e.g., professional title).
- Careers. If you apply for a job with us, you will provide us with your name, email address, phone number, employment history, and any other information you choose to include in your job application. We use ADP to facilitate this application process. ADP may collect, record, and store the information you provide in your job application. Please review ADP's privacy policy [here](#).
- Email Alerts. If you sign up to receive email alerts from us, you will provide us with your email address.
- Webcast Presentations. If you register for one of our webcast presentations, you will provide us with your name, company name, and email address. We use third-party providers to host our webcasts, such as GlobalMeet, TWST Events, and Notified. Please review GlobalMeet's privacy policy [here](#), TWST Events's privacy policy [here](#), and Notified's privacy policy [here](#).
- Contact Us. If you contact us, you will provide us with your name, email address, and any other information you choose to include in your message.

Personal Data as You Navigate Our Sites

We automatically collect certain personal data through your use of the Sites and our use of cookies and other tracking technologies, such as the following:

- Usage Information. For example, pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- Device Information. For example, hardware model, operating system, application version number, and browser.
- Mobile Device Information. Aggregated information about whether the Sites are accessed via a mobile device or tablet, the device type, and the carrier.
- Location Information. Location information from visitors to the Sites on a city-regional basis.

For more information on our cookie usage see our "COOKIES AND OTHER TRACKING TECHNOLOGIES" section below.

Personal Data We Collect About You from Other Sources

In some cases, we may receive personal data about you from other sources. This includes government entities, business affiliates, data analytics providers, advertising networks, data brokers, operating systems and platforms, mailing list providers, social networks, advertising and marketing partners, and, if applicable, your caregiver or healthcare provider.

How We Use Your Personal Data

In addition to the purposes stated above, we may use all the personal data we collect in accordance with applicable law such as to:

- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Sites or Services or to inform you of any changes to our Sites or Services;
- Provide support;
- Maintain and improve our Sites and Services;
- Protect the security and integrity of our Sites and Services;
- Investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of our Terms and Conditions, and to otherwise fulfill our legal obligations;
- Monitor compliance with and enforce this Privacy Policy and any applicable agreements and policies;
- Defend our legal rights and the rights of others;
- Fulfill any other purposes for which you provide it;
- For any purpose that is reasonably necessary to or compatible with the original purpose for which we collected the personal data as disclosed to you; and
- Comply with applicable law.

How We Share Your Personal Data

We may share the personal data that we collect about you in the following ways:

- With vendors who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, backup, analysis, etc.);
- To the extent we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our or a third party's legal rights, including providing personal data to others for the purposes of fraud prevention;
- With any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal data;
- With any other person or entity as part of any business or asset sale, equity transaction, merger, acquisition, bankruptcy, liquidation, or similar proceeding, or in preparation for any of these events;
- With any other person or entity where you consent to the disclosure; and

- For any other purpose disclosed by us when you provide the personal data or for any other purpose we deem necessary, including to protect the health or safety of others.

Cookies and Other Tracking Technologies

How We Use Cookies

Like many other companies, we use cookies and other tracking technologies (collectively, “Cookies”). Cookies are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to:

- Estimate audience size and usage patterns;
- Understand and save your preferences for future visits, allowing us to customize the Sites and Services to your individual needs;
- Advertise new content and services that relate to your interests;
- Keep track of advertisements and search engine results;
- Compile aggregate data about Site traffic and Site interactions to resolve issues and offer better Site experiences and tools in the future; and
- Recognize when you return to the Sites.

We set some Cookies ourselves and others are set by other entities. We use Cookies set by other entities to provide us with useful information to help us improve our Sites and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Facebook, and other similar companies.

How You Can Opt Out of Cookies

Browser Settings

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Sites. You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org or www.allaboutcookies.org.

Platform Controls

You can opt out of Cookies set by specific entities by following the instructions found at these links:

- Adobe: <https://www.adobe.com/privacy/opt-out.html>
- Google: <https://adssettings.google.com>
- Meta: <https://www.facebook.com/privacy/guide/ads>
- Microsoft: <https://account.microsoft.com/privacy/ad-settings/>

Advertising Industry Resources

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt out of some of those Cookies by accessing the [Network Advertising Initiative’s website](#) or the

Digital Advertising Alliance’s website. For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative’s Mobile Choices website](#).

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

Google Analytics

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google’s [privacy policies](#). To learn more about Google’s partner services and to learn how to opt out of tracking of analytics by Google, click [here](#).

Other Types of Collecting Activities

The Sites and Services may use Cookies third-party vendors provide to collect information on user behavior (e.g., pages visited, buttons and links clicked, limited information entered, and mouse movements). This information enables us to monitor and improve the user experience.

“Do Not Track” Signals

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Sites do not currently interpret, respond to or alter their practices when they receive “Do Not Track” signals.

Choices About Your Personal Data

Review and Request Changes to Your Personal Data

To review or request changes to any of your personal data that we have collected, please contact us at dataprotection@alkermes.com.

Marketing Communications

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at dataprotection@alkermes.com.

Security

We maintain commercially reasonable security measures to protect the personal data we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your personal data, we cannot guarantee absolute security.

Third-Party Links

The Sites may contain links that will let you leave the Sites and access another website. Linked websites are not under our control. We accept no responsibility or liability for these other websites.

Children’s Privacy

The Sites and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal data from children under 13.

Notice to Nevada Residents

Nevada law allows Nevada residents to opt out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to another person. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt out of sales and we will record your instructions and incorporate them in the future if our policy changes. You may send opt-out requests to dataprotection@alkermes.com.

Notice to California Residents

We do not disclose personal information obtained through our Sites or Services to third parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

Accessibility

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.

How to Contact Us

If you have questions or concerns about our privacy policies or practices, please contact us at dataprotection@alkermes.com

AVADEL CONSUMER HEALTH DATA PRIVACY POLICY

Avadel CNS Pharmaceuticals, LLC and its affiliates (“we,” “our,” or “us”) respects the privacy of your “consumer health data” as defined by applicable law. This Consumer Health Data Privacy Policy (“Policy”) is designed to assist you in understanding how we collect, use, share, and safeguard your consumer health data. Depending on the state in which you reside, this Policy applies to individuals who access our websites (collectively, “Sites”) and any of our services (“Services”). This Policy applies in addition to our U.S. Online Privacy Policy.

Categories of Consumer Health Data We Collect

Depending on how you interact with our Sites and Services, we will collect the following categories of consumer health data for the following purposes and uses:

- **Diagnostic Information:** When you sign up for updates regarding our products or attempt to enroll in our RYZUP™ Support Services, you may provide us with information regarding your health including concerns of excessive daytime sleepiness, cataplexy or narcolepsy.
- **Demographic Information:** When you attempt to enroll in our RYZUP™ Support Services, you may provide us with your date of birth and gender so that we can properly enroll you in the program.
- **Health Care Seeking Behavior:** When you visit our Sites, sign up for updates regarding our products or attempt to enroll in our RYZUP™ Support Services, you may share with us information related to your need or desire for certain healthcare services.

In addition, several of the categories of personal data we collect may be considered consumer health data depending on the context and extent of information you provide to us. To view the full list of categories of personal data we may collect, please see the “Personal Data We Collect” section of our U.S. Online Privacy Policy above.

Depending on the state in which you reside, we may use cookies and other tracking technologies; however, we do not use them to identify your past, present, or future health status. For more information, please see our U.S. Online Privacy Policy above. We do not use non-strictly necessary cookies for Washington residents.

In addition to the purposes stated above, we may process consumer health data for purposes allowed under applicable law, such as to prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any activity that is illegal under applicable law; preserve the integrity or security of our systems; or investigate, report, or prosecute those responsible for any such action that is illegal under applicable law.

Categories of Sources from Which We Collect Consumer Health Data

We receive consumer health data directly from you. In some cases, we may receive personal data about you from other sources. This includes government entities, advertising networks, data brokers, operating systems and platforms, mailing list providers, social networks and advertising and marketing partners. We do not receive information from advertising networks or data analytics providers regarding Washington residents.

Sharing of Consumer Health Data

We share all of the categories of consumer health data listed above with the following categories of third parties and specific affiliates:

- Service Providers
- Operating Systems and Platforms
- Data Analytics Providers
- Advertising Networks
- Social Media Networks

Your Privacy Rights

Under applicable law, you may have certain privacy rights regarding your consumer health data, including the right to:

- Confirm whether we are collecting, sharing, or selling your consumer health data;
- Access your consumer health data, including a list of all third parties and affiliates with whom we shared or sold your consumer health data and an active email address or other online mechanism that you may use to contact any third parties;
- Withdraw your consent from our collection and sharing of your consumer health data; and
- Delete your consumer health data.

To exercise your rights, please submit a request by emailing us at dataprotection@alkermes.com. If legally required, we will comply with your request upon verification of your identity. To do so, we will ask you to verify data points based on information we have in our records. If we refuse to take action regarding your request, you may appeal our decision by replying to the email you received from us in response to your request.

Effective as of March 18, 2026