

Alkermes, Inc. U.S. Colleague Privacy Notice

Last Updated August 2026

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Who We Are

Alkermes, Inc. (Alkermes, the Company, we, our, or us) values your privacy and the protection of your Personal Data. This Colleague Privacy Notice (**Notice**) explains how we collect, store, use, share, transfer, delete, and otherwise process information collected from or about you known as **Personal Data** (defined further below in this Notice).

Purpose of this Privacy Notice

This Notice describes the types of Personal Data that Alkermes may collect or process, how we may use and disclose that Personal Data, how you may exercise any rights you may have regarding our processing of your Personal Data, and how you can contact us if you would like to exercise them or if you have any questions or concerns.

This Notice applies to **residents of the United States (U.S.) who are** (1) employees (including temporary employees), officers, directors, contractors, and agents of the Company who have been granted access to Company Systems (collectively, **Colleagues**); and (2) the dependents, beneficiaries, contacts, and family members of Colleagues (**Colleague Contacts**), which may include minors below the age of 16. Contractors who have not been granted access to Company Systems are not Colleagues for purposes of this Notice and should refer to the [Alkermes Inc., Privacy Notice](#), or other notice as applicable. This Notice also applies anywhere it is posted or referenced.

This Notice also governs the processing of Personal Data when you access Company systems and/or infrastructure (including virtual collaboration tools) remotely, regardless of whether you use a Company-owned device, network, tool, system, or infrastructure (**Company Systems**) or a personal or non-Company-owned device, network, tool, system, or infrastructure to access Company Systems or conduct Company activities (**non-Company Systems**). This includes remote work while travelling, as well as work from non-Company premises (like your home), whether on a temporary or permanent basis. All relevant Company policies apply fully and must be followed by Colleagues.

Alkermes may provide you with a different privacy notice in certain specific situations, in which case that privacy notice will apply to the Personal Data collected or processed in that specific situation, rather than this one.

If you provide us with Personal Data related to anyone other than yourself, please note that you are responsible for complying with all privacy laws prior to providing that information to Alkermes (including collecting consent, if required).

Under this Notice, Alkermes, Inc., is the entity that you interact or engage with, or is the entity who

employees you and is responsible for the collection and use of your Personal Data (known in some jurisdictions as the “controller”).

Please review this Notice carefully. To the extent permitted by law, by providing us your Personal Data or otherwise interacting with us, you are agreeing to this Notice. If you do not agree with our policies and practices, it is your choice not to maintain an employment relationship or otherwise engage with us.

Personal Data Collected, Purposes, and Recipients

What is Personal Data?

Personal Data is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link to or associate with a specific individual, such as a name, address, email address, or telephone number. Personal Data in some jurisdictions can include information that indirectly identifies a person, even absent other identifying information.

Personal Data may include information considered sensitive under applicable privacy laws, such as biometric information (including fingerprints, voiceprints, retina or iris scans, and scans of hand or face geometry), genetic information, health information, financial account information, specific geolocation, ethnic or racial origin, information concerning your sex life or your sexual orientation, social security number, driver’s license number, state identification card number, passport number, and other similar information. Personal Data that could be considered sensitive Personal Data under any law is indicated with a caret (^) in the chart below.

We will process any Personal Data we collect in accordance with law and as described in this Notice (unless, as explained above, a separate policy or notice governs). In some circumstances, if you do not provide us with certain Personal Data, we may be unable to provide you with employment, benefits, or other related services.

The below table is a high-level summary of the types of Personal Data we may collect about you. Following that high-level summary is additional detail and information on how we collect, process, and use Personal Data and the potential recipients of your Personal Data, now and in the preceding 12 months. The types of Personal Data we collect and disclose depends on your relationship with Alkermes. Not all of the categories listed in the following charts may apply to you. If the nature of your relationship with Alkermes changes, additional categories of Personal Data may also apply. Alkermes does not use or disclose Personal Data or sensitive Personal Data other than for the purposes specified herein.

	Identity and Contact Information	Demographic Information	Video, Audio, and Recorded Information	Technical or Electronic Network Activity Information	Commercial and Financial Information	Professional, Employment, and Educational Information	Health-Related Information	Biometric Identifiers	Anonymized / De-Identified Data[†]
	This may include name, email, phone number, etc.	This may include characteristics of protected classifications under some laws and may include age, gender, disability, etc.	This may include photos, video, call, or chat recordings, etc.	This may include Internet Protocol (IP) address, browser, device type, etc.	This may include financial information, compensation /payroll, etc.	This may include job title, work communications , etc.	This may include medical records, health insurance information, disabilities, etc.	This may include fingerprints, voiceprints, retina or iris scans, hand or face geometry, etc.	Data that removes individual personal data
Colleagues	X	X^	X^	X^	X^	X	X^	X^	X
Colleague Contacts	X	X^	X	X^	X^		X^	X^	X

Personal Data that may be considered sensitive is noted with a “^”. If required to do so, we will obtain your consent prior to processing your sensitive Personal Data.

Colleagues	
<i>Employees (including temporary employees), officers, directors, contractors, and agents of the Company</i>	
We may process your Personal Data when you enter into an employment or contractor relationship with the Company.	
Examples of the types of data we process (<i>Personal Data that may be considered sensitive is noted with a “^”</i>)	
Identity and contact information, such as:	• First and last name and unique pseudonym • personal/work postal address • personal/work phone number • personal/work email address • Colleague or badge identification number • Social Security card/number^ • driver’s license card/number or other government identification card/number^ • passport/passport number^
Demographic Information, such as:	• sex or gender^ • racial or ethnic origin^ • nationality^ • country of birth^ • citizenship^ • immigration status^ • marital status^ • date of birth^ • religious or philosophical beliefs^ • sexual orientation^
Video, Audio, and Recorded Information, such as:	• still images^ • video (including via CCTV)^ • recordings of calls with customers or other third-parties^ • recordings of online events^
Technical or electronic network activity information, such as:	• Internet Protocol (IP) addresses (which may identify your general geographic location or company) • precise geolocation data^ • browser type and browser language • device type

	• browsing history • search history • use and activity of Company Systems and non-Company Systems you use to conduct Company business • passwords and access codes for the Company Systems • data collected from cookies or other similar technologies^
Commercial and financial information, such as:	• bank account/routing information^ • credit card number, expiration date, and security code^ • transactional information generated by the use of a Company payment (credit) card • credit status or history
Professional employment and educational information, such as:	• work location • practice area/department • work authorization information • communications (e.g., email, instant messages, text messages) and documents you may generate, send, or receive related to Company business or using Company Systems • timekeeping and attendance • hire and service dates • names of any direct reports and other reporting line information • working hours and status • employment status • terms of employment • benefits information • compensation/payroll information^ • performance evaluations and assessments^ • tax and other deduction or withholding information • information concerning disciplinary action, as well as information that is necessary for a Company internal or external investigation, compliance with requests by authorities, or for the establishment, exercise, or defense of legal claims • travel information • information about previous and current assignments and responsibilities • information regarding potential conflicts of interest

	• training information, such as training attendance, reports, and records • educational background and qualifications • knowledge of foreign languages • prior employment history, including dates and locations • reference/referral information • criminal record or history^ • unlawful or objectionable behavior^ • civil actions, judgments and/or court documents related to you^ • appointment as a director of any company, partnership, or unincorporated body • ownership of more than a certain percentage of any corporate body • information regarding registrations with any securities regulatory agencies, financial services, or other governmental authorities • background checks^ • employment applications • CV, application letter, and/or resumé • professional qualifications
Health and Insurance Information, such as:	• medical records^ • absence records associated with illness or accidents, including related to exposure to certain materials or contaminants^ • health insurance information^ • parental or other leave^ • work-related injuries or claims^ • details of any applicable mobility situation or disability information^
Biometric Identifiers, such as:	• fingerprints^ • voiceprints^ • retina or iris scans^ • scans of hand or face geometry^
Anonymized / de-identified data:	• Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under privacy laws. When we process anonymized or de-identified data, we will maintain and use such data in de-identified form and will not attempt to re-

	identify the information, except for the purpose of determining whether our de-identification processes satisfy the requirements of applicable privacy laws.
Where do we get the data?	
• you directly • those authorized to provide Personal Data on your behalf, such as your authorized representative(s) • your devices • Company Systems (including closed-circuit television (CCTV) or non-Company Systems • third parties that provide access to information you make available, such as social media companies • business partners and other third parties that assist us providing employment, benefits, or other services	
Why do we process the data? ***	
• to manage the employment relationship • to conduct Company business • to administer benefits • to evaluate Colleagues' performance • to facilitate Colleague communication and collaboration • to manage business relationships • to communicate with you • to send you updates • to identify and authenticate you (including through biometric identifiers for building access and device authentication) • to detect security incidents • to protect against malicious, fraudulent, or illegal activity • to ensure the appropriate use of Company Systems and conduct of Company business • for short-term, transient use • for administrative purposes • for internal research and development • for quality assurance • to comply with legal and regulatory obligations	
What are the Lawful or Legal Bases of Processing?	
• for the purposes of our legitimate interests • in preparation for or to perform a contract with you	

• to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights • in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*
Who receives the data?
• Alkermes and our affiliates • other Colleagues within the Company • our business partners and customers • individuals or entities that you designate or instruct us to share your Personal Data with • authorized representatives • third parties who assist with fraud prevention, detection, and mitigation • third parties who assist with our information technology and security programs and our loss prevention programs • Alkermes' lawyers, auditors, and consultants • partners that assist us in providing employment, benefits, or other services or help us improve our administration**

Colleague Contacts	
<i>Dependents, contacts, and family members of Colleagues including, potentially, persons under 16 years of age[†]</i>	
We may process your Personal Data when providing benefits or other services to you as directed by a Colleague, such as when a Colleague lists you as an emergency contact or the beneficiary of health or retirement benefits, or when you visit one of our facilities.	
Examples of the types of data we process (<i>Personal Data that may be considered sensitive is noted with a “^”</i>)	
Identity and contact information, such as:	• first and last name and unique pseudonym • personal/work postal address • personal/work phone number • personal/work email address • Social Security card/number^
Demographic Information, such as:	• Sex or gender • racial or ethnic origin^ • nationality^

	• country of birth^ • citizenship^ • immigration status^ • marital status^ • date of birth^ • religious or philosophical beliefs^ • sexual orientation^
Technical or electronic network activity information, such as:	• Internet Protocol (IP) addresses (which may identify your general geographic location or company) • precise geolocation data^ • browser type and browser language • device type • browsing history • search history • use and activity of Company Systems and non-Company Systems you use to interact with the Company • passwords and access codes for the Company Systems • data collected from cookies or other similar technologies^
Video, Audio, and Recorded Information, such as:	• still images^ • video (including via CCTV)^ • recordings of online events^
Commercial and financial information, such as:	• bank account/routing information^ • credit card number, expiration date, and security code^
Health and Insurance Information, such as:	• medical records^ • health insurance information^ • disabilities^ • work-related injuries or claims^
Biometric Identifiers, such as:	• fingerprints^ • voiceprints^ • retina or iris scans^ • scans of hand or face geometry^

Anonymized / de-identified data:	Anonymized and/or de-identified data is data for which your individual personal characteristics and information have been removed such that you are not identified or identifiable and the information is no longer considered Personal Data under privacy laws. When we process anonymized or de-identified data, we will maintain and use such data in de-identified form and will not attempt to re-identify the information, except for the purpose of determining whether our de-identification processes satisfy the requirements of applicable privacy laws.
Where do we get the data?	
• you directly • Colleagues with whom you are associated (e.g., family member, emergency contact, beneficiary) • those authorized to provide Personal Data on your behalf, such as your authorized representative	
Why do we process the data? ***	
• to administer benefits • to communicate with you • to send you updates • to identify and authenticate you (including through biometric identifiers for building access and device authentication) • to detect security incidents • to protect against malicious, fraudulent, or illegal activity • to ensure the appropriate use of Company Systems • to improve Company Systems • for short-term, transient use • for administrative purposes • for internal research and development • for quality assurance • to comply with legal and regulatory obligations	
What are the Lawful or Legal Bases of Processing?	
• for the purposes of our legitimate business interests • in preparation for or to perform a contract with you • to comply with legal and regulatory obligations and to establish, exercise, or defend our legal claims and rights	

• in circumstances where we have requested and received consent and for other purposes that may be required or allowed by law*
Who receives the data?
• Alkermes and our affiliates • individuals or entities that you designate or instruct us to share your Personal Data with • authorized representatives • third parties who assist with fraud prevention, detection, and mitigation • third parties who assist with our information technology and security programs and our loss prevention programs • Alkermes' lawyers, auditors, and consultants** • partners that assist us in providing or improving employment, benefits, or other services or help us improve our marketing or administration ** ***

*The legal bases relied upon by Alkermes include those recognized under applicable privacy laws. When required and allowed, we will seek to obtain your consent or authorization to process your Personal Data and only process your Personal Data upon receiving such consent. In such circumstances, your refusal to provide consent or authorization will have no adverse consequence on you. However, in some circumstances where consent is required, it may be impossible for Alkermes to manage its relationship with you or provide you with employment, benefits, or other services absent your consent to process your Personal Data.

**In limited circumstances, recipients may include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, to the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Notice or required by law.

***We may use artificial intelligence or machine learning technologies ("AI") when carrying out some of the purposes described above. All AI processes that we use to do so are subject to human oversight and Alkermes' internal policies and procedures, and we are committed to upholding fairness, transparency, and accountability in their use. Please note that we do not use profiling or automated decision-making technology to make significant decisions or decisions that have legal or similarly-significant effects about Colleagues or Colleague Contacts as those terms are defined by applicable state laws. We may collect and use certain Personal Data for the purpose of training large language models for employment, benefit and internal business purposes only. We do not sell Personal Data for the purpose of training large language models.

†Alkermes may process Personal Data regarding minors below the age of 16, but only when a Colleague provides such Personal Data to Alkermes.

Service Providers and Third Parties

Service providers or vendors (or processors) acting on our behalf must execute agreements requiring them to maintain confidentiality and to process Personal Data only to provide the services to us and in a way that aligns with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations. Our processors and subprocessors can be located in the United States and Europe among other locations.

Combination of Data with Data Received from Third Parties and Affiliates

We may combine information we collect, including Personal Data, with Personal Data that we may obtain from third parties. Alkermes may jointly use your Personal Data to provide you with employment, benefits, or other services, including joint use with Alkermes affiliates, as well as third parties who assist or partner with us to provide employment, benefits, or other services.

Links to Other Systems

Company Systems may contain links to websites, applications, or services that are not owned or operated by Alkermes. Such links do not imply an endorsement with respect to any third party, any website, or the products or services provided thereby. You should carefully review the privacy policies and practices of other websites and services as we cannot control and are not responsible for privacy policies, notices, or practices of third-party websites, applications, and services.

Your Rights Regarding Your Personal Data

If you are a resident of California or another U.S. state that affords you similar rights under applicable law, you may have the following rights with respect to some or all of your Personal Data:

- To request information about this Notice
- To request information about or explanation of whether, and how, we process your Personal Data
- To request access to and a copy of your Personal Data, including to provide your Personal Data directly to another organization (called, in some locations, a right to data portability)
- To request that we correct or update your Personal Data
- To request that we delete your Personal Data
- To request that we restrict, suspend, block, or to object to or opt-out of the processing of your Personal Data, including your sensitive Personal Data, including by withdrawing consent
- To appeal the denial of a request
- To lodge a complaint with the regulatory authority in your jurisdiction.

If you are entitled to make a request under this section and wish to make a complaint about how we process your Personal Data or to appeal the denial of one of your requests, please contact us at dataprotection@alkermes.com. Even if you make a complaint to us, you may also in some jurisdictions lodge a complaint with the relevant regulatory authority in your location. Upon rejection of an individual rights request you may also have the right to file a lawsuit in court in accordance with applicable law. We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you with employment, benefits, or other services, or it may otherwise affect the way we are able to interact with you.

We will make reasonable efforts to respond promptly to your requests. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be

aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Safeguarding Personal Data

Consistent with applicable laws and requirements, Alkermes has put in place physical, technical, and administrative safeguards designed to protect Personal Data from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through Company Systems that process your Personal Data. In addition, it is your responsibility to safeguard any passwords, identification or ID numbers, or similar individual information associated with your use of the Company Systems.

How Long Your Personal Data Will Be Kept

We generally retain Personal Data for as long as needed for the specific purpose or purposes for which it was collected or obtained, and as outlined in this Notice. In some cases, we may be required to retain Personal Data for a longer period of time as required by law or for other necessary or required purposes. Whenever possible, we aim to de-identify or anonymize your Personal Data or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the length of time we need to keep your Personal Data; and (iii) whether retention is determined to be necessary for Alkermes due to limitation periods, litigation, or other legal or regulatory obligations. Alkermes takes reasonable steps to securely dispose of Personal Data upon the expiration of retention periods, taking into consideration these litigation, legal, or regulatory obligations.

Transfer of Personal Data

We operate in various countries throughout the world, including, but not limited to, the United States and European Union (EU). Please be aware that Alkermes, Inc.'s affiliated companies may process your Personal Data. Additionally, the Personal Data we collect and process may be transferred and maintained outside your state, province, country, or other jurisdiction, country, or location where the privacy laws may not be as protective as those in your location, including the United States. Alkermes has put in place lawful transfer mechanisms and appropriate safeguards, in accordance with its legal requirements, to protect your Personal Data.

Changes to This Privacy Notice

We reserve the right to change this Notice from time to time. We will alert you when changes have been made by indicating the date this Notice was last updated as the date the Notice became effective or as otherwise may be required by law. It is recommended that you periodically revisit this Notice to learn of any changes.

Contact Us

If you have questions or comments about this Notice, please contact us by one of the methods below:

Email: dataprotection@alkermes.com

Mail: Alkermes, Inc.

Attn: EVP, Chief Legal Officer

900 Winter Street

Waltham, MA 02451