

CALIFORNIA PRIVACY POLICY

OVERVIEW

Retrophin, Inc., and its subsidiaries (collectively “**Retrophin**,” “**we**,” “**our**,” or “**us**”) are committed to respecting your privacy. Retrophin’s California Privacy Policy (“**Policy**”) applies to “Consumers” as defined by the California Consumer Privacy Act (“**CCPA**”) and is a supplement to Retrophin’s other privacy policies or notices. In the event of a conflict between any other Retrophin policy, statement or notice and this Policy, this Policy will prevail for California Consumers and their rights under the CCPA. Please also see our [general privacy policy](#) posted or referenced on our websites. Retrophin also has specific policies for how we process personal data from our [website \(cookies\)](#), for [clinical trials](#) and personal data for our employees.

This Policy covers the collection, use, disclosure, and sale of California Consumers’ “Personal Information” as defined by the CCPA (“**personal data**”), except to the extent such personal data is exempt from the notice obligations of the CCPA. This Policy also covers rights California Consumers have under the CCPA. Our data practices may change, and if our practices become materially different, we will provide notice as applicable in connection with the collection, including references to other applicable privacy policies and notices.

Consistent with the CCPA, job applicants, current and former employees and independent contractors and subjects of certain business-to-business communications acting solely in their capacity as representatives of another business, are not considered “Consumers” for purposes of this Policy or the rights described herein.

TYPES OF PERSONAL DATA WE COLLECT AND USE

The personal data we may collect, and share will depend on the nature of our interactions with Consumers, but can including the following categories of sources and purposes:

Categories of Personal Data Collected	Categories of Sources	Purpose for Collecting/Sharing	Categories of Third Parties to Whom We Disclose Personal Data
Identifiers - such as full name, postal address, online identifier, email address, previous residence address, phone numbers, social security number, unique personal identifier, or other similar identifiers.	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Health Care Practitioners through website or online submissions information requests. ○ Consumers website browsing sessions. ○ From our Service or Business Partners. 	<ul style="list-style-type: none"> ○ To provide you more information on a clinical trial or research. ○ To provide you investor information or compensation. ○ To provide you educational and marketing information about our own commercial and pipeline products and related disease states. ○ For customer support and relationship management. ○ To set your website preferences through your online activity gathered through our weblogs and cookies. 	<ul style="list-style-type: none"> ○ Service Providers. ○ Distributors. ○ Manufacturers. ○ External Agencies. ○ External Auditors and Regulators. ○ Public Authorities / Government as required.

Categories of Personal Data Collected	Categories of Sources	Purpose for Collecting/Sharing	Categories of Third Parties to Whom We Disclose Personal Data
<p>Individual Records - including contact details, date of birth, health data, insurance policy information, medical condition.</p>	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Service Providers. ○ Distributors for product distribution. ○ Consumers and Health Care Practitioners for patient services and customer relationship management. ○ Directly from a clinical trial through the participation in clinical trials. 	<ul style="list-style-type: none"> ○ To provide you more information on a clinical trial or research. ○ To provide you educational and marketing information about our own commercial and pipeline products and related disease states. ○ For customer support and relationship management including product distribution. ○ To conduct clinical trials and research including providing information to clinics, research institutions, clinical research organizations, and healthcare professionals that we engage with for clinical trials. ○ To conduct relevant day to day business operations and adhere to applicable compliance laws. 	<ul style="list-style-type: none"> ○ Service Providers. ○ Distributors. ○ Manufacturers. ○ External Agencies. ○ External Auditors and Regulators. ○ Public Authorities / Government as required.
<p>Protected Characteristics - including but not limited to age, race or ethnicity, gender, disability or specific conditions.</p>	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Health Care Practitioners and Service Providers for patient services and customer relationship management. ○ Clinical trial participants. 	<ul style="list-style-type: none"> ○ To provide you more information on a clinical trial or research. ○ For customer support and relationship management including product distribution. ○ To conduct clinical trials and research including providing information to clinics, research institutions, clinical research organizations, and healthcare professionals that we engage with for clinical trials. ○ To conduct relevant day to day business operations and adhere to applicable compliance laws. 	<ul style="list-style-type: none"> ○ Service Providers. ○ External Agencies, and Regulators. ○ Public Authorities / Government as required.
<p>Commercial Information - including but not limited to records of products or services purchased.</p>	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Health Care Practitioners for patient services and customer relationship management. 	<ul style="list-style-type: none"> ○ For customer support and relationship management including product distribution. ○ To conduct relevant day to day business operations and adhere to applicable compliance laws. 	<ul style="list-style-type: none"> ○ Service Providers. ○ Distributors. ○ Manufacturers.

Categories of Personal Data Collected	Categories of Sources	Purpose for Collecting/Sharing	Categories of Third Parties to Whom We Disclose Personal Data
Professional or Employment Information - including, but not limited to professional, educational or employment related information.	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Health Care Practitioners through website or online submissions and information requests. 	<ul style="list-style-type: none"> ○ To process job applicants and consideration of employment including working with a third-party background check provider to conduct necessary background checks. ○ To provide you more information on a clinical trial or research. ○ To provide you investor information or compensation. ○ To provide you educational and marketing purposes about our own commercial and pipeline products and related disease states. 	<ul style="list-style-type: none"> ○ Service Providers. ○ Distributors. ○ Manufacturers. ○ External Agencies. ○ External Auditors and Regulators. ○ Public Authorities / Government as required.
Non-public Education Records - including but not limited to education information not publicly available.	<ul style="list-style-type: none"> ○ You (<i>directly from participant</i>). ○ Health Care Practitioners for commercial or product research. 	<ul style="list-style-type: none"> ○ To process job applicants and consideration of employment including working with third party background check provider to conduct necessary background checks. ○ To conduct market research on Retrophin commercial and pipeline products and related disease states. 	<ul style="list-style-type: none"> ○ Service Providers. ○ External Agencies. ○ Public Authorities / Government as required.

As permitted by applicable law, Retrophin does not treat deidentified data or aggregate consumer information as personal data and reserves the right to convert, or permit others to convert, your personal data into deidentified data or aggregate consumer information. We have no obligation to re-identify such information or keep it longer than we need it to respond to your requests.

CALIFORNIA MINORS

Retrophin’s websites are not directed towards children (under the age of 18). We do not knowingly collect personal data from minors or children through our websites. Some of our patient services or commercial products processes personal data from minors. However, the consent of a parent or guardian is sought in these cases. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us at dataprotection@retrophin.com or as noted in the contact information listed below.

PURPOSES FOR COLLECTING AND PROCESSING PERSONAL DATA

We collect and process personal data to ensure the proper operation of our day-to-day business and for complying with legal obligations. We collect, use and disclose the following categories of personal data for business purposes: Identifiers, Individual Records, Protected Characteristics, Commercial Information, Professional or Employment Information and Non-Public Education Records.

Our third-party vendors and business partners may themselves engage services providers or subcontractors to enable them to perform services for us, which is considered sub-processing and is an additional business purpose for which we are providing you notice. In addition, we may collect, use and disclose your personal data as required or permitted by applicable law. Notwithstanding anything to the contrary in our [general privacy policy](#), we typically restrict use of your personal data that is shared with third parties for business purposes. We do not believe that we “sell” personal data to any third parties. For more information on your “Do Not Sell” rights, see the Do Not Sell subsection below.

CALIFORNIA PRIVACY RIGHTS

We provide California Consumers the privacy rights described in this section. You have the right to exercise these rights via an authorized agent who meets the agency requirements of the CCPA and related regulations. To exercise any of your privacy rights as a California Consumer, please contact us at:

- Address: 3721 Valley Centre Drive, Suite 200, San Diego, CA 92130
Attn: Chief Compliance Officer;
- Phone: +1-888-969-7879 or +1-858-832-2812;
- Email: dataprotection@retrophin.com.

If you are disabled and need reasonable accommodations to facilitate your request, please contact us. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process. We will verify identity based on matching information you provided with data we have maintained on you in our systems. This data could include, but is not limited to, email address, mailing address, or phone number.

We will make commercially reasonable efforts to identify personal data that we collect, process, store, disclose and otherwise use and to respond to your California Consumer privacy rights requests. We will typically not charge a fee to fully respond to your requests; however, we may charge a reasonable fee if the request is deemed excessive or overly burdensome. We may also refuse to act upon your request if it is deemed to be repetitive or unfounded. If we determine that your request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision.

Consistent with the CCPA and our interest in the security of your personal data, we will not deliver your social security number, driver’s license number or other government-issued identification number, financial account number, any health or medical identification number, an account password, or security questions or answers in response to a CCPA request.

Right to Know:

Information Rights:

You have the right to send us a request using one of the methods listed above, up to twice every twelve-months, for any of the following in the prior twelve months:

- The categories of personal data we have collected about you.
- The categories of sources from which we collected your personal data.
- The business or commercial purposes for our collecting or selling your personal data.
- The categories of third parties to whom we have shared your personal data.

- The specific pieces of personal data we have collected about you.
- A list of the categories of personal data disclosed for a business purpose, or that no disclosure occurred.

Obtaining Copies of Personal Data:

You have the right to make or obtain a transportable copy using one of the methods listed above, up to twice every twelve-months, of your personal data that we have collected and are maintaining within the prior twelve months.

Right to Delete:

Except to the extent we have a basis for retention under CCPA, you may request that we delete your personal data that we have collected directly from you and are maintaining using one of the methods listed above. Our retention rights include, without limitation, to complete transactions and service you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes, including maintaining business records, to comply with legal obligations, to engage in research, to exercise or defend legal claims, and to cooperate with law enforcement. We are not required to delete your personal data that we did not collect directly from you.

Do Not Sell:

We do not believe that we “Sell” Consumer personal data as those terms are defined by the CCPA. While there is not yet a consensus, data practices of third-party cookies and tracking devices associated with our websites may arguably constitute a “Sale” of your personal data as defined by the CCPA. However, we do not think that these third-party technologies and activities are a “Sale” of your personal data by us, and until we are provided guidance otherwise, we do not intend to treat them as such. You can, however, exercise control over browser-based cookies by adjusting the settings on your browser. You may have to opt-out separately via each browser and other device you use. For more information on cookies and other tracking devices and ways to exercise preferences regarding them, see our [Cookies Policy](#).

Right Not to Be Subject to Discrimination:

You have the right under the CCPA not to be discriminated against for exercising your CCPA rights. We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights.

Authorized Agents:

Authorized agents of Consumers may make a request using one of the methods listed above. As permitted by the CCPA, any request you submit to us is subject to an identification and verification process, and confirmation of the agent’s authority, which may include attestation under penalty of perjury. Absent a power of attorney, we will also require the Consumer to verify their own identity.

Limitations on Rights:

Notwithstanding anything to the contrary, we may collect, use and disclose your personal data as required or permitted by applicable law and this may override your CCPA rights. In addition, we need not honor any of

your requests to the extent that doing so would infringe upon our or any other person or party's rights or conflict with applicable law.

CHANGES TO THIS POLICY

We reserve the right, at any time, to modify, alter, or update this Policy, and any such modifications, alterations, or updates will be effective upon posting.

THIS POLICY WAS LAST UPDATED ON JUNE 29, 2020.