



CUMBERLAND PHARMACEUTICALS INC.

PRIVACY NOTICE UPDATED 7/1/2025

SUMMARY: Cumberland Pharmaceuticals is committed to protecting the privacy and security of your personal information. This privacy notice below explains what information we gather about you, what we use that information for, and to whom we give the information. It also sets out your rights and who you can contact for more information or queries.

INFORMATION ABOUT YOU WHICH WE PROCESS: We may collect or obtain information about you that you provide to us, that we obtain from third parties, or that is publicly available. This information about you may include your name, age, gender, date of birth, and contact information. It may also include more 'sensitive' personal data. For a more detailed description of the information about you that we may process, please see the applicable paragraph below.

HOW WE USE INFORMATION ABOUT YOU: We collect and process information about you and/or your business to enable us to provide our services to you, to enable us to provide you with information that we think may be of interest to you and in order to meet our legal or regulatory obligations. For a more detailed description of how we use information about you, please read below.

SHARING AND TRANSFERRING YOUR INFORMATION: We may disclose information about you to some third parties. For more information, please see continue reading. Data collected in the European Economic Area ("EEA") might be transferred to countries outside the European Economic Area ("EEA"). These countries may have different and less stringent data protection laws. When we transfer information about you outside the EEA, we will put in place appropriate safeguards to ensure that your information remains adequately protected.

YOUR RIGHTS: Under data protection laws you have a number of rights, including the right to: 1) request copies of your data, 2) request rectification of your data, 3) request erasure of your data, 4) object to us processing your data, and 5) request us to restrict the processing. For more information about your privacy rights please read the applicable paragraph below.

CONTACT US: If you have any questions or comments about privacy issues or wish to exercise any of the rights set out above please write to our Chief Compliance Officer at:

Cumberland Pharmaceuticals Inc, 1600 West End Ave., Suite 1300, Nashville, TN 37203-7003, USA

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PRIVACY NOTICE

1. WHO THIS PRIVACY NOTICE APPLIES TO AND WHAT IT COVERS

1.1 This privacy notice applies to Cumberland Pharmaceuticals Inc. and the entities we own or control (“Cumberland Pharmaceuticals”, “we”, “us” or “our”) with offices at:

Cumberland Pharmaceuticals Inc, 1600 West End Ave., Suite 1300, Nashville, TN 37203-7003, USA.

1.2 We are committed to protecting your personal data and processing your information in an open and transparent manner.

1.3 This privacy notice sets out how we will collect, process, store, and protect information about you when:

1.3.1 providing services or products to you or our customers;

1.3.2 you use “our Website”; or

1.3.3 performing any other activities that form part of the operation of our business.

1.4 When we refer to “our Website” or “this Website” in this policy we mean the specific corporate and product webpages of cumberlandpharma.com.

1.5 This privacy notice also contains information about when we share your personal data with other members of the Cumberland Pharmaceuticals Network and other third parties (for example, our service providers).

16 In this privacy notice, your information is sometimes called “personal data”. We may also sometimes collectively refer to processing, collecting, protecting, and storing your personal data as “processing” such personal data.



2. WHAT INFORMATION WE COLLECT

2.1 We may collect, record and use information about you in physical and electronic form and will hold, use and otherwise process the data as set out in this notice.

2.2 In the case of providing services to you, we may collect or obtain personal data about you. We may also collect personal data from you when you use this Website.

2.3 We may collect or obtain such data because you give it to us, or third party service providers that we use to help operate our business or because it is publicly available. The legal grounds for processing your data are set out in paragraph 5 below.

2.4 We may also collect or obtain personal data from you because we observe or infer that data about you from the way you interact with us or others. For example, to improve your experience when you use this Website and ensure that it is functioning effectively, we (or our service providers) may use cookies (small text files stored in a user's browser) which may collect personal data.

2.5 The personal data that we may collect or obtain may include:

2.5.1 your name, gender, age, and date of birth;

2.5.2 your contact information, such as your address and contact details (including your email and mobile telephone number);

2.5.3 country of residence;

2.5.4 employment and education details (for example, the organization you work for, your job title, and your education details);

2.5.5 your IP address, your browser type and language, your access times; complaint details;

2.5.6 details of how you use our products and services.

2.6 The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about your: dietary requirements (for example, where Cumberland Pharmaceuticals would like to provide you with lunch during a meeting); health (for example, so that we can make reasonable accommodations for you in our buildings or at our events).

3. INFORMATION PROVIDED BY OR ABOUT THIRD PARTIES

3.1 Where we are provided with personal data about you by our customers or another third party, we take steps to ensure that the customer or other third party has complied with the data protection laws and regulations relevant to that information; this may include, for example, that the customer or other third party has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to process that information as described in this privacy notice.

3.2 If any information which you provide to us relates to any third party, by providing us with such personal data you confirm that you have obtained any necessary permissions from such persons to



the reasonable use of their information in accordance with the above provisions, or are otherwise permitted to give us this information.

4. HOW WE USE INFORMATION ABOUT YOU

4.1 We collect and process information about you and/or your business to enable us to provide our services to you and in order to meet our legal or regulatory obligations.

4.2 We may use your personal data to communicate with you or share it with a third party or regulatory agencies as a part of our business of scientific research. We do not sell, share, or distribute your data to any providers who could use it for commercial use.

4.3 We may also use your personal data for the purposes of, or in connection with:

4.3.1 applicable legal, regulatory requirements;

4.3.2 requests and communications from competent authorities;

4.3.3 customer purposes, which may involve: (i) sending you insights, opinions, updates, reports on topical issues or details of our products and services that we think might be of interest to you; (ii) contacting you to receive feedback on services; and (iii) contacting you to invite you to events, seminars, briefings;

4.3.4 recruitment and business development purposes

4.3.5 services we receive from our professional advisors, such as lawyers, accountants, and consultants.

Use of personal data collected via our Website

4.4 In addition to the purposes connected to the operation of our business above, we may also use your personal data collected via our Website:

4.4.1 to manage and improve our Website;

4.4.2 to tailor the content of our Website to provide you with a more personalized experience and draw your attention to information about our products and services that may be of interest to you; or

4.4.3 to manage and respond to any request you submit through our Website.

5. THE LEGAL GROUNDS WE USE FOR PROCESSING PERSONAL DATA

5.1 We are required by law to set out in this privacy notice the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

5.1.1 you have explicitly agreed to us processing your information for a specific reason;

5.1.2 the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;



5.1.3 the processing is necessary for compliance with a legal or regulatory obligations we have such as keeping records for medical agencies or providing information to a public body or law enforcement agency; or

5.1.4 the processing is necessary for the purposes of a legitimate interest pursued by us, which might be:

(a) to provide our services to you or other third parties and ensure that our customer engagements are well-managed;

(b) to prevent fraud;

(c) to protect our business interests;

(d) to ensure that complaints are investigated;

(e) to evaluate, develop or improve our services or products; or

(f) to keep you or our customers informed about relevant products and services and provide you with information, unless you have indicated at any time that you do not wish us to do so.

5.2 To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because either: (i) you have given us your explicit consent to process that data; (iv) the processing is necessary for the establishment, exercise or defense of legal claims or (v) you have made the data manifestly public.

5.3 Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

6. SHARING YOUR PERSONAL DATA

6.1 In connection with one or more of the purposes outlined in the “How we use information about you” section above, we may disclose details about you to the following recipients, or categories of recipients:

6.1.1 third parties that provide services to us

6.1.2 competent authorities (including courts and authorities regulating us);

6.1.3 any other person or organization after a restructure, sale, or acquisition of Cumberland Pharmaceuticals, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both);

7. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION

7.1 If you are living in member countries of the European Union information about you in our possession may be transferred to other countries (which may include countries outside the European Economic Area (“EEA”)), such as jurisdictions in which and through which transactions are affected; jurisdictions linked to your engagement with us; jurisdictions from which you regularly receive or transmit information; or jurisdictions where our third parties conduct their activities.



7.2 You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies, and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process.

7.3 When we, or our permitted third parties, transfer your personal data outside the EEA, we or they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA.

7.3.1 the transfer is to a country deemed to provide adequate protection of your personal data by the European Commission; or

7.3.2 where you have consented to the transfer.

7.4 If we transfer your personal data outside the EEA in other circumstances (for example because we have to provide such information by law), we will put in place appropriate safeguards to ensure that your personal data remains adequately protected.

7.5 We may share non-personal, de-identified, and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership, and promotional purposes.

8. PROTECTION OF YOUR PERSONAL DATA

8.1 We use a range of physical, electronic, and managerial measures to ensure that we keep your personal data secure, accurate, and up to date. These measures include:

8.1.1 education and training to relevant staff to ensure they are aware of our data protection obligations when processing personal data;

8.1.2 administrative and technical controls to restrict access to personal data to a 'need to know' basis;

8.1.3 technological security measures, including fire walls, encryption, and anti-virus software; and

8.1.4 physical security measures, such as staff security passes to access our premises.

8.2 Although we use appropriate security measures once we have received your personal data, the transmission of data over the internet (including by e-mail) is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

9. HOW LONG WE KEEP YOUR INFORMATION

9.1 We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to



which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

9.2 We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the relevant activity or services; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise in respect of the services.

10. YOUR RIGHTS

10.1 You have various rights in relation to your personal data. In particular, you have a right to:

10.1.1 obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;

10.1.2 be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from where it was obtained);

10.1.3 ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;

10.1.4 ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data; withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);

10.1.5 receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);

10.1.6 object to our processing of your personal data.

10.2 Any request for access to or a copy of your personal data must be in writing and we will endeavor to respond within a reasonable period and in any event within one month in compliance with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

10.3 You may also use the contact details in paragraph 12.1 if you wish to make a complaint to us relating to your privacy.

11. SENDING YOU MARKETING INFORMATION

11.1 We may use your information from time to time to inform you by letter, telephone, email, and other electronic methods, about our products, trials, and services which may be of interest to you.

11.2 You may, at any time, request a change to your marketing preferences by following the instructions in communications from us or contacting us in the way described in paragraph 12.1 below.



12. RIGHT TO COMPLAIN

12.1 If you wish to exercise any of the rights relating to your information set out above, or if you have any questions or comments about privacy issues, or you wish to raise a complaint about how we are using your information, you can contact us in the following ways:

12.1.1 write to Chief Compliance Officer

12.1.2 send an email to info@cumberlandpharma.com

13. CHANGES TO THIS PRIVACY NOTICE

13.1 We may modify or amend this privacy notice from time to time.

13.2 To let you know when we make changes to this privacy notice, we will amend the revision date at the top of this page. The new modified or amended privacy notice will apply from that revision date. Therefore, we encourage you to periodically review this notice to be informed about how we are protecting your information.

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