



## **Privacy Notice**

**Effective Date: January 24, 2017**

This Privacy Notice describes the privacy practices of Vertex Pharmaceuticals Incorporated and its subsidiaries and affiliates in connection with Vertex's websites and mobile applications that display this Privacy Notice. The Privacy Notice describes the types of personal information that Vertex collects and processes, how Vertex may use and share the information, and the choices that are available to you with respect to Vertex's handling of the information. Please note that some functionality described in this Privacy Notice may not be available on all of our websites or mobile applications, to all individuals, or at all times.

### **Personal Information We Collect**

In connection with your use of our websites and mobile applications, you may submit information directly to us or direct third parties to share information about you with us. The types of personal information we may collect in connection with your use of our websites and mobile applications include:

- Personal and business contact information, such as your name, job title and employer name, email address, mailing address, and phone number;
- Username and password that you may select in connection with establishing an account on our website or mobile application;
- A profile picture (which may be your photograph) that you may choose to associate with an account you establish on our mobile application;
- Medical or health information that you choose to provide to us, including information about your treatments for medical conditions and medications you may take;
- Healthcare professionals' and medical researchers' information about their work and research; and

- Information provided by job applicants (such as work experience, education, salary, languages spoken, and other details an applicant may choose to provide to us when applying for a job).

We, our service providers, and our business partners, may also collect certain information about the use of our websites and mobile applications by automated means, such as cookies, web beacons and other technologies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, is used to transmit information back to a web server. We and our service providers and business partners may collect information about your online activities over time and across third-party websites when you use our websites and mobile applications.

The information that may be collected by automated means includes:

- Details about the devices that are used to access our websites or mobile applications (such as the IP address, and type of operating system and web browser)
- Dates and times of visits to, and use of, our websites and mobile applications;
- Information about how our websites and mobile applications are used (such as the content that is viewed on our websites and how users navigate between our webpages, or the features of our mobile applications that are used and how users navigate between screens on our mobile applications)
- URLs that refer visitors to our websites
- Search terms used to reach our websites or locate our mobile applications.

Because there is not yet a consensus on how companies should respond to web browser-based do-not-track (“DNT”) mechanisms, we do not respond to web browser-based DNT signals at this time. Please see the “Your Rights and Choices” section below for information about how you may opt out of, or limit the use of, your browsing behavior for online behavioral advertising purposes.

## **How We Use The Personal Information We Collect**

We may use personal information to:

- Communicate with you about the products and services we offer, including our websites and mobile applications, and respond to your requests, inquiries, comments, and suggestions;
- Tailor the content we display to you in our communications, and in connection with your use of our websites or mobile applications;
- Establish and maintain an account on our website or mobile application;
- Invite you to participate in surveys and other market research;
- Operate, evaluate and improve our business, our websites and mobile applications, and other products and services we offer (including to develop new products and services);
- Analyze and enhance our communications and strategies (including by identifying when emails sent to you have been received and read);
- Process employment applications, as described in the “Careers” section below;
- Comply with legal requirements, judicial process, and our company policies (including to verify users’ identity in connection with access or correction requests); and
- Protect against, identify, investigate, and respond to fraud, illegal activity (such as incidents of hacking or misuse of our websites and mobile applications), and claims and other liabilities, including by enforcing the terms and conditions that govern the use of our websites and mobile applications.

We may also aggregate and/or de-identify any information that we collect in connection with our websites and mobile applications, such that the information no longer identifies any specific individual. We may use, disclose and otherwise process such information for our own legitimate business purposes – including historical and statistical analysis and business planning – without restriction.

## **Personal Information We Share**

Vertex does not share personal information except as described in this Privacy Notice. We may share information that we obtain about you with:

- Our affiliates and subsidiaries, for the purposes described in this Privacy Notice; and
- Our service providers that perform services on our behalf. We do not authorize our service providers to use or share your personal information for their own purposes.

Unless prohibited by applicable law, we reserve the right to transfer the information we maintain in the event we sell or transfer all or a portion of our business or assets. If we engage in such a sale or transfer, we will – where required by applicable law – make reasonable efforts to direct the recipient to use your personal information in a manner that is consistent with this Privacy Notice. After such a sale or transfer, you may contact the recipient with any inquiries concerning the processing of your personal information.

In addition, we may share your information to comply with legal requirements, and protect against and prevent fraud, illegal activity (such as identifying and responding to incidents of hacking or misuse of our websites and mobile applications), and claims and other liabilities.

## **Careers**

If you submit your information in connection with job opportunities at Vertex via our website, we will use and disclose the information to process your application (including to contact you and/or your references and former employers if appropriate), to monitor recruitment statistics, and to comply with government reporting requirements. We also retain statistical information about applicants to help inform our recruitment activities.

## **Minors**

Our websites and mobile applications are not intended for individuals under 18 years of age, and individuals must be at least 18 years of age to register with our websites and mobile applications. We do not knowingly collect personal information from children under age 13. If we learn that we have collected personal information from a child under the age of 13, we will delete that information.

## Your Rights and Choices

You have certain rights and choices regarding Vertex's processing of your personal information:

- You may unsubscribe from receiving marketing or other commercial emails from Vertex by following the instructions included in the email. However, even if you opt out of receiving such communications, we retain the right to send you non-marketing communications (such as important product safety information, or changes in website or mobile application terms);
- Your web browser may provide you with the ability to disable receiving certain types of cookies; however, if you disable cookies, some features or functionality of our websites may not function correctly;
- Some of the business partners that collect information about your activities on our websites and in our mobile applications may be members of organizations or programs that provide choices to individuals regarding the use of their browsing behavior for purposes of targeted advertising. For example, you may opt out of receiving targeted advertising through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting your country, and then clicking "Choices" (or similarly-titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.
- You may request access to the personal information that we maintain about you. We will provide you with a copy of the personal information we maintain about you in the ordinary course of business, to the extent the information is not available via our websites or mobile applications. You may request to correct any errors in your personal information. In countries that provide you with a legal right to request that we delete your personal information, or request that we cease some or all processing of your personal information, you may make such a request; however, your choice to exercise these rights may affect your ability to continue to use our websites or mobile applications. We reserve the right to verify user identity in connection with access or correction requests to

help ensure that we provide the information to individuals to whom it pertains.

### **International Data Transfers**

We may transfer your personal information to countries other than the country in which the data was originally collected for the purposes described in this Privacy Notice. For example, if you are located outside of the United States, we typically transfer your personal information to the United States, where Vertex is headquartered. The countries to which we transfer personal information may not have the same data protection laws as the country in which you initially provided the personal information.

### **How We Protect Personal Information**

Vertex maintains reasonable administrative, technical and physical safeguards designed to protect the personal information we maintain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, we cannot guarantee that the measures we maintain will ensure the security of the personal information.

### **Links to Websites and Third-Party Content**

For your convenience and information, we may provide links to websites and other third-party content that is not owned or operated by Vertex. The websites and third-party content to which we link may have separate privacy notices or policies. Vertex is not responsible for the privacy practices of any entity that it does not own or control.

### **Updates To Our Privacy Notice**

Vertex reserves the right to change this Privacy Notice at any time. When we update this Privacy Notice, we will notify you of changes that are deemed material under applicable legal requirements by updating the date of this Privacy Notice and providing other notification as required by applicable law. We may also notify you of changes to the Privacy Notice in other ways, such as via email or other contact information you have provided.

## **How To Contact Us**

You may contact us with questions or comments about this Privacy Notice or our privacy practices, or to request access to or correction of your information. Our contact information is as follows:

Vertex Pharmaceuticals Incorporated  
Attn: Legal Department - Privacy  
50 Northern Avenue  
Boston, MA 02210  
[privacy@vrtx.com](mailto:privacy@vrtx.com)

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