Notice of Personal Data Processing

Novo Nordisk Limited processes (e.g. collects, uses, stores, and shares) personal data for different reasons (purpose) and uses a number of legal bases to process that personal data. This Notice explains how we process personal data and lists the most common purposes for which Novo Nordisk holds personal data. If the purpose for which we hold your personal data is not listed, please contact the Novo Nordisk local Data Protection Responsible for further information (see section 1).

Novo Nordisk Limited is required by law to protect your personal data. We will process any personal data about you in accordance with this Notice and with applicable laws.

1. Who are we?

The company responsible for processing your personal data is: Novo Nordisk Limited; 1st Floor, Block A, The Crescent Building, Northwood Business Park, Santry, Dublin 9, Company number: 61378; tel: 01 862 9700.

You can always contact Novo Nordisk Limited or the Novo Nordisk local Data Protection Responsible at privacyireland@novonordisk.com with questions or concerns about how we process your personal data.

2. How do we collect personal data about you?

We get your personal data from the following sources (examples detailed below are not exhaustive):,

- From you directly: e.g. when you contact Novo Nordisk by telephone, e-mail, fax or letter:
  - with an enquiry regarding a Novo Nordisk product
  - with an order for a medicinal or non-medicinal sample e.g. an insulin delivery device
  - with an order for patient material e.g. glucose monitoring diary
  - to coordinate attendance at an event
  - to report a side effect to a Novo Nordisk product
  - to report a technical complaint with a Novo Nordisk product
  - to engage with Novo Nordisk on a vendor/supplier basis
  - to engage with Novo Nordisk on HCP consultancy/service basis
  - to apply for a job within Novo Nordisk

- From Healthcare Professionals (HCP): e.g. when a HCP (e.g. doctor, nurse, pharmacist, dentist) reports a side effect experienced by a patient to Novo Nordisk, we process both the HCP's personal data and also patient personal data provided by the HCP

including but not limited to, patient initials, gender, date of birth and relevant medical history. We will only process **pseudonymised** patient personal data provided by the **HCP**.

- From publicly available publications, websites, or social media: e.g. in compliance with legislation, Novo Nordisk screens medical literature and Novo Nordisk hosted websites and social media for reports of side effects to our drugs reported by HCPs. We may access HCP personal data from these sources e.g. name, contact address and e-mail address, in order to report side effects in our safety database and, where possible, to contact the HCP regarding the side effect. We will only process the information available **publicly** and any other personal data provided by the **HCP** during routine follow up.

- From a previous employer: e.g. as part of our recruitment policy, we contact previous employers to confirm employment history and personal data may be provided by your previous employer. We will only process the information provided by your **previous employer**.

- From other Novo Nordisk entities: e.g. if you contact a Novo Nordisk affiliate in another country with an enquiry or to report a side effect, your personal data will be shared between affiliates. If you are participating in an event being organised by an affiliate in another country, your personal data may be shared between affiliates to arrange logistics or Transfer of Value. We will only process the information provided by **you**.

- From vendors or consultants working on behalf of Novo Nordisk: e.g. you may provide personal data detailed in section 4 to a third party event organiser, distributor, market researcher, call centre, patient support provider working on behalf of Novo Nordisk. Only the personal data provided by **you** will be processed by Novo Nordisk and the third party working on behalf of Novo Nordisk.

3. Why do we process your personal data?

We process personal data about you for the following purposes:

- To respond to your questions or request for information
- To process requests for medicinal and non-medicinal (e.g. durable devices) samples
- To process requests for patient material
- To invite you to a conference or event
- To coordinate a conference or event
- To reimburse you
- To recruit for a job in Novo Nordisk

- To conduct interviews as part of a research project
- To engage with you and your company on a supplier/vendor basis
- To perform a scientific evaluation of any complaint or side effect potentially related to a Novo Nordisk medicinal product
- To file side effects in our global safety database, which is regularly analysed for overall patterns
- To assess patterns associated with complaints, including side effects
- To contact you with safety information regarding Novo Nordisk products e.g. Dear Healthcare Professional (DHPC) communication
- To analyse data for compliance
- To meet transparency obligations
- To investigate compliance/fraud

You are not required to provide us with your personal data. If you do not want Novo Nordisk to use your personal data, in some cases we may not be able to:

1. Contract with you
2. Consider you for a position within Novo Nordisk
3. Respond to your enquiry
4. Process a request for a medicinal or non-medicinal sample
5. Invite you to, or arrange for your attendance at a conference or event

4. What personal data do we process about you?

For the purposes described above in Section 3, we may process the following types of personal data (examples detailed below are not exhaustive):

- Contact information (name, address, telephone number, email address): e.g. personal data of this nature is processed in order to respond to enquiries and orders, report side effects, organise events, engage with you and/or the company you work for, provide patient support programmes etc.
- Financial information (bank account details and amounts paid): e.g. personal data of this nature is processed during the documenting and arranging of payments to you for services rendered to Novo Nordisk.
- Work history: e.g. personal data of this nature is processed during the recruitment of new employees to Novo Nordisk. Novo Nordisk will also process CVs of HCPs we contract to perform clinical studies and other services on our behalf.
- Emergency contact details (such as: name and telephone of family members): e.g. personal data of this nature is processed in some cases when organising events.
- Data revealing racial or ethnic origin: where made available, personal data of this nature is processed during side effect reporting.

- Data concerning health and medicinal products you are using: e.g. personal data of this nature may be processed during side effect reporting or if a health condition is made known during event organisation.
- Data regarding political opinions or religious or philosophical beliefs: e.g. personal data of this nature may be processed when organising events, during side effect reporting, handling medical information enquiries or during event organisation (for example where you state you observe Ramadan, you may disclose your religious beliefs to Novo Nordisk).
- Data concerning sex life or sexual orientation: e.g. personal data of this nature may be processed during medical information enquiry handling or side effect reporting.
- Data relating to criminal convictions and offences: e.g. personal data of this nature may be processed when investigating compliance or fraud.

5. Why are we allowed by law to process your personal data?

Our processing of your personal data requires a legal basis. By law, we are allowed to process your personal data based on the any of the following legal bases:

- You gave consent for us to process your personal data e.g. reporting Transfer of Value (ToV); you gave us verbal or written consent to record details concerning a side effect in our safety database.
- The processing is necessary to fulfil a contract with you e.g. payment for speaking services, attendance at an advisory board.
- The processing is necessary for our compliance with a legal obligation e.g. reporting side effects to our products.
- The processing is necessary to protect your vital interests or the interests of another person.
- The processing is necessary for our legitimate interests' e.g.
  - organise a conference or event
  - respond to a query
  - as part of the recruitment and selection process of candidates for a position within Novo Nordisk
  - to process a request for a medicinal or non-medicinal sample

6. How do we share your personal data?

We may share your personal data with:

- Suppliers or vendors that assist our company (e.g. consultants, IT service providers, financial institutions, law firms, hotels, event organisers, license partners)
- Other Novo Nordisk entities (e.g. Novo Nordisk affiliates in other countries)
- Public authorities, including health and/or regulatory authorities

- Other pharma companies, if a side effect is considered related to their product(s)

7. When do we transfer your personal data outside the EU/EAA?

For the purposes described above in Section 3, we transfer your personal data to countries outside the European Economic Area (EEA). The level of data protection in certain countries outside the EEA does not conform to the level of data protection for personal data currently applied and enforced within the EEA.

We therefore use the following safeguards, as required by law, to protect your personal data in case of such transfers:

- The transfer is to a Novo Nordisk entity covered by Novo Nordisk's Binding Corporate Rules, available at https://www.novonordisk.com/about-novo-nordisk/corporate-governance/personal-data-protection.html.
- The destination countries are deemed by the EU Commission to have an adequate level of protection of personal data.
- We have entered into Standard Contractual Clauses for the Transfer of Personal Data to Third Countries. You can get a copy of the Clauses by contacting us as described in Section 1.

8. How long will we keep your personal data?

How long personal data is stored depends on the nature of the information we hold and the purpose for which the personal data is processed. Novo Nordisk determines retention periods having full regard to applicable laws.

The most common purposes for which Novo Nordisk holds personal data and the associated Novo Nordisk retention time periods are as follows:

- Technical complaints: 12 years
- Side effect and other safety information: Length of time the active ingredient is marketed plus 10 years (a minimum of 25 years)
- Patient material orders: 5 years
- Customer enquiries: 5 years
- Medicinal and non-medicinal sample orders: 6 years
- Data relating to a non-healthcare contractual agreement: 10 years
- Data relating to a healthcare related contractual agreement (e.g. clinical trial agreement or distribution related agreement): 50 years
- CVs submitted for a position within Novo Nordisk: 12 months
- Data relating to an organised conference or event: 5 years
- Conduct market research: 5 years

If the purpose for which we hold your personal data is not listed above, please contact the Novo Nordisk local Data Protection Responsible at privacyireland@novonordisk.com or call 01 862 9700.

9. What are your rights?

In general, you have the following rights:

- You can get an overview of what personal data we have about you.
- You can get a copy of your personal data in a structured, commonly used and machine-readable format.
- You can get an update or correction to your personal data.
- You can have your personal data deleted or destroyed.
- You can have us stop or limit processing of your personal data.
- If you have given consent for us to process your personal data (see Section 5), you can withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- You can submit a complaint about how we process your personal data to the Data Protection Authority.

Under applicable law, there may be limits on these rights depending on the specific circumstances of the processing activity. Contact us as described in Section 1 with questions or requests relating to these rights.

Updated: June 2022