

Notice of Personal Data Processing Handling of Safety Information and Customer Complaints

Novo Nordisk A/S is required by law to collect complaints and safety information concerning our products. In Novo Nordisk we collect all safety information on our products into a database. We analyse the data on a regular basis to determine if there is any new information about our products that we need to share with authorities, doctors and patients. This is all done with the purpose of securing the safety of our products and patients.

Novo Nordisk is required by law to collect complaints and safety information concerning our products and whilst doing so to also protect your personal data. This Notice explains how we process (e.g. collect, use, store, and share) your personal data. We will process any personal data about you in accordance with this Notice and with applicable law.

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:

- From you directly
- From Healthcare Professionals (HCP)
- From publicly available publications, websites, or social media
- From other Novo Nordisk entities
- From vendors or consultants 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 perform scientific evaluations of complaints and side effects potentially related to Novo Nordisk's medicinal products. Complaints and side effects will be filed in databases and will be regularly analysed for overall patterns.
- To respond to your questions or request for information

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:

- Contact information (name, address, telephone number, email address);
- Government identification number;
- Data revealing racial or ethnic origin;
- Data concerning health and medicinal products you are using;
- Data regarding political opinions or religious or philosophical beliefs;
- Data concerning sex life or sexual orientation;

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 described above in Section 4 based on the following legal bases:

- The processing is necessary for our compliance with a legal obligation;

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, 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/EEA?

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/content/dam/nncorp/global/en/data-privacy/novo-nordisk-binding-corporate-rules.pdf>
- 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?

We will keep your personal data for the following period of time:

- Side effect and other safety information: Length of time the active ingredient is marketed plus 10 years (a minimum of 25 years)
- For technical complaints of NN medicinal products without related side effect: 12 years.
- Customer enquiries without related technical complaint or side effect: 5 years

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 a 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. The Apis bull logo is a registered trademark owned by Novo Nordisk A/S