# NOTICE OF PERSONAL DATA PROCESSING Attendance at a Novo Nordisk organised or sponsored meeting

Novo Nordisk Limited is required by law to 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 1<sup>st</sup> 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 <u>privacyireland@novonordisk.com</u> 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 companies we enter into agreements with
- From other Novo Nordisk entities
- From vendors or consultants

## 3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We process personal data about you for the following purposes:

- To coordinate a conference or event
- 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

You are not required to provide us with your personal data. If you do not want Novo Nordisk to use your personal data, you will not be able to participate in a Novo Nordisk organised 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:

- Contact information (name, address, telephone number, email address);
- Data concerning health and medicinal products you are using (should this information be shared by you);
- Data concerning sex life or sexual orientation (should this information be shared by you);
- Data concerning your racial or ethnic origin (should this information be shared by you);
- Data regarding political opinions or religious or philosophical beliefs (should this information be shared by you)

## 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:

- You gave consent for us to process your personal data or;
- The processing is necessary for our compliance with a legal obligation

Or, we rely on the following legitimate interests to process that data:

- Novo Nordisk has a legitimate interest in using information about a Transfer of Value that you received from us so that we can comply with our transparency obligations;
- There is a legitimate public interest in better understanding the financial relationships that HCPs may have with the pharmaceutical industry in the interests of transparency and trust in the pharmaceutical industry;

## 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/EAA?

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 <u>https://www.novonordisk.com/about-novo-nordisk/corporate-governance/personal-data-protection.html</u>.

- 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;

#### HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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

- If during the meeting you report a customer complaint with a Novo Nordisk product: 12 years
- If during the meeting you report a side effect and/or other safety information experienced during the use of a Novo Nordisk product or product type produced by Novo Nordisk: Length of time the active ingredient is marketed plus 10 years (a minimum of 25 years)
- For as long as required by applicable law.

#### 8. 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 machinereadable 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.

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