

## **Notice of Personal Data Processing (Clinical Research)**

Novo Nordisk Limited (Novo Nordisk) processes (e.g. collects, uses, stores, and shares) personal data for different reasons (purpose) and uses a number of legal bases to process personal data. This Notice explains how Novo Nordisk process personal data and the purposes for which Novo Nordisk holds personal data.

Novo Nordisk 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; 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 [privacyireland@novonordisk.com](mailto: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 or through the parties involved as part of your participation in a Novo Nordisk clinical research trial

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

We process personal data about you for the following purposes:

- To conduct research which aims to improve healthcare. This means that we will use your data, collected in the course of a clinical research study, in the ways needed to conduct and analyse the results of the clinical research study.

### **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)
- Financial information (bank account number, amounts paid to you for services rendered)
- Emergency contact (e.g., name and telephone of family members)
- Data revealing racial or ethnic origin;
- Data concerning health;
- Genetic data, biometric data for the purpose uniquely identifying a natural person;
- 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.

We will not process your personal data if we do not have a proper justification foreseen in the law for that purpose. Therefore, we will only process your personal data if:

- we have obtained your prior consent;
- the processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- the processing is necessary to comply with our legal or regulatory obligations; or
- the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

Please note that, when processing your personal data on this last basis, we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such 'legitimate interests' are data processing activities performed:

- to develop a transparent and professional relationship with healthcare professionals;
- to promote Novo Nordisk innovation in the pharmaceutical field;
- to manage Novo Nordisk human and financial resources and optimise interactions with healthcare professionals;
- to ensure that the right medicine according to a well-informed healthcare professional technical and professional opinion reaches the patient.
- to benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
- to offer our products and services to our customers;
- to prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- to sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and
- to meet our corporate and social responsibility objectives.
- As a pharmaceutical company we have a legitimate interest in using information relating to your healthcare for clinical research studies, when you agree to take part in a clinical research study.

## **6. HOW DO WE SHARE YOUR PERSONAL DATA?**

We may share your personal data with:

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- our personnel (including personnel, departments or other companies of the Novo Nordisk group);
- our IT systems providers, cloud service providers, database providers and consultants;

The above third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

## **7. WHEN DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EAA?**

When your personal data is transferred and processed outside the EU/EAA it is being pseudonymised, this means that it is not identifiable without a code. This code will reside only with your study doctor. The information will only be used for the purpose of health and care research and cannot be used to contact you or to affect your care.

## **8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?**

We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

## **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.

Your rights to access, change or move your information are limited, as we need to manage your information in specific ways in order for the research to be reliable and accurate. If you withdraw from the study, we will keep the information about you that we have already obtained. To safeguard your rights, we will use the minimum personally identifiable information possible.

Please contact us as described in Section 1 of this notice with questions or requests relating to these rights.

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