

## **PRIVACY NOTICE FOR INVESTIGATORS**

Novo Nordisk A/S is required by law to protect your personal data. This Privacy Notice explains how and for which purposes Novo Nordisk A/S (“Novo Nordisk”, “we”, “us” and “our”) collects and processes your personal data in connection with Investigator Sponsored Studies”. Novo Nordisk is committed to process and protect your personal data with respect and in accordance with this Privacy Notice and applicable laws.

### **1. WHO ARE WE?**

The company responsible for processing your personal data is:

Novo Nordisk A/S  
Novo Alle 1  
2880 Bagsværd  
[privacy@novonordisk.com](mailto:privacy@novonordisk.com)  
+45 4444 8888

You can always contact Novo Nordisk A/S or the Novo Nordisk Data Privacy Officer at [privacy@novonordisk.com](mailto:privacy@novonordisk.com) with questions or concerns about how we process your personal data.

### **2. HOW DO WE COLLECT PERSONAL DATA ABOUT YOU?**

We collect personal data about you throughout your activity on <https://www.novonordiskiss.com/>. This includes

- Basic contact information about you when you sign up
- Site statistics that is generated through your interaction with our website
- Information relating to reimbursement and payment when you submit a payment request

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

We process personal data about you for the following purposes:

- **Purpose 1:** To create and manage your user account on <https://www.novonordiskiss.com/> to provide you with a platform to submit your proposal or protocol
- **Purpose 2:** To conduct basic traffic analysis to understand how we can improve your experience on the website
- **Purpose 3:** To manage payment request in relation to requests for reimbursement.

### **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:

- **For purpose 1:**
  - a. Contact information (name, address, telephone number, email address, CV).
- **For purpose 2:**
  - a. Web analytics data (including whether you are a returning visitor and what pages you have viewed during your visit).
- **For purpose 3:**
  - a. Contact information (name, address, telephone number, email address);
  - b. Payment details

### **5. WHAT IS OUR LEGAL BASIS 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:

- For purpose 1, the processing is necessary for our legitimate interest pursuant to GDPR article 6. litra f. the legitimate interest is to enable you to access content on our website and to protect the network security, confidentiality, integrity and accessibility of information present in our solution.
- For purpose 2, the processing is necessary for our legitimate interest pursuant to GDPR article 6. litra f. The legitimate interest is to ensure that Novo Nordisk's software solutions are continuously developed to suit the user's needs.
- For purpose 3, the processing is necessary for compliance with a legal obligation to record and report on financial transactions pursuant to GDPR article 6. litra c.

## 6. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

- Suppliers or vendors that assist our company (e.g., IT service providers, financial institutions, law firms)
- Other Novo Nordisk entities (e.g., Novo Nordisk affiliates in other countries)

## 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:

- For purpose 1 We keep the information of 15 years after you have last interacted with the website
- For purpose 2 We keep the information of 2 years after you have last interacted with the website
- For purpose 3 we keep the information for a period of 5 years from the day transaction date

## 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.

<b>You have right to:</b>	<b>How you can use your rights</b>
Get insight into your data	You can get information of what identifiable personal data we have about you and be provided with a copy of your personal data in a structured format, readable to a machine
Object to our processing of your data	You request that we stop processing your personal data in certain situations
Restrict use of your data	Request that we stop or limit the use of your personal data
Have your data deleted	Request that your personal data is deleted or destroyed
Have your data corrected	Ask us to update or correct information about you
Complain about how we use your data	Submit a complaint to your local Data Protection Authority. In Denmark the relevant authority is the Danish Data Protection Agency ('Datatilsynet') - <a href="https://www.datatilsynet.dk/kontakt">https://www.datatilsynet.dk/kontakt</a>

You should be aware that your rights may be subject to conditions or restrictions, meaning that you will not always be able to exercise all your rights. It depends on the specific circumstances in connection with the processing activities.

Please contact us as described under Section 1 if you have questions or requests relating to these rights.