Notice of personal data processing related to safety information

Novo Nordisk is required by law to collect safety information and product quality complaints 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.

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.

1. Who are we?

The company responsible for processing your personal information is:

Novo Nordisk (China) Pharmaceuticals Co., LTD

Address: 5th Floor, Tower 3, Lei Shing Hong Center, No. 8, Guangshun South Street, Chaoyang District, Beijing

Postal Code: 100102

Or

Novo Nordisk (Shanghai) Pharma Trading Co., LTD

Address: Room A-1018, No. 188 Yesheng Road, Lingang New Area, China (Shanghai) Pilot Free Trade Zone

Postal Code: 200135

Based on the legal basis described in Article 5, we may need to transfer safety information containing your personal data to Novo Nordisk headquarters:

Novo Nordisk A/S of Denmark

Contact Address: Novo Alle 1 DK-2880 Bagsvaerd, Danmark

If you have any questions or concerns regarding how we handle your personal data, please feel free to contact the personal data protection taskforce of Novo Nordisk China at any time(china-privacy@novonordisk.com) or the Data Privacy Officer at Novo Nordisk headquarters (privacy@novonordisk.com).

2. How do we collect personal data about you?

We get your personal data from the following sources:

- From you directly
- From Health Care Professionals such as the patient's nurse, a pharmacist or doctor
- From publicly available publications, websites, or social media

3. Why do we process your personal data?

We process personal data about you for the following purposes:

- To perform a scientific evaluation of any safety information and product quality complaints potentially related to a Novo Nordisk medicinal product
- To file safety information in our global safety database, which is regularly analysed for overall patterns
- To assess patterns associated with safety information, including side effects

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:

If you are the reporter:

- Basic information (name, address, telephone number, email address, occupation and relation with the patient)
- The patient's personal information reported by you

If you are the patient:

- Basic information (name, address, telephone number, email address, gender, date of birth, age/age group, nationality, height, weight, body mass index (BMI) value)
- medical history, allergy history, lifestyle habits
- adverse event reports or descriptions treatment records, medication records, diagnostic and test results, hospitalization records

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 the legal safety obligation

6. How do we share your personal data?

We may share your personal data with:

- Health authorities
- The headquarters of Novo Nordisk (or Novo Nordisk's affiliates in other countries, if required to perform the legal safety obligations in accordance with applicable laws)
- Partner companies that assist our company (e.g. licence partners, consultants, IT service providers)
- Other pharma companies, if an adverse event is considered related to their product(s)

7. When do we transfer your personal data outside of China?

For the purposes described in Section 3 above, based on the legal basis described in Section 5, and in accordance with the requirements of applicable laws, we will implement de-identification measures and then transfer the de-identified patient data outside China:

- Patient ID, gender, date of birth, age, nationality, height, weight, body mass index (BMI) value)
- medical history, allergy history, lifestyle habits
- Safety information reports or descriptions treatment records,
- medication records, diagnostic and test results, hospitalization records

If you have any questions regarding the aforementioned cross-border transfer, you can contact us through the contact information provided in Section 1.

8. How long will we keep your personal data?

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

- 12 years for data relating to product quality complaints
- For data related to safety information we will keep the data for a minimum of 10 years after the withdrawal of the product
- Up to 5 years for all other enquiries

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 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.