

# Privacy Notice

Novo Nordisk Developer Portal

Effective Date 27 May, 2022

## **1 Processing of your personal data**

Novo Nordisk is responsible for processing your personal data on the Novo Nordisk Developer Portal website. Our contact information is:

Novo Nordisk A/S  
Novo Allé  
2880 Bagsværd  
Denmark  
CVR no. 24256790  
+45 4444 8888  
[privacy@novonordisk.com](mailto:privacy@novonordisk.com)

This Privacy Notice tells you how we use your personal data. We encourage you to contact Novo Nordisk or the Novo Nordisk Data Privacy Officer at [privacy@novonordisk.com](mailto:privacy@novonordisk.com) if you have questions about this notice or to your data privacy rights as a user of the Website.

Below you will find a description of the personal data, which Novo Nordisk will collect and process about you as well as the purpose and on which basis Novo Nordisk is processing the data.

Novo Nordisk will collect and process personal data about you for the legitimate interest of Novo Nordisk to expand external access to develop solutions which can connect with certain of Novo Nordisk's smart insulin pens by standardizing the onboarding process for developers via the Website. As part of registering your personal account at the Website and to respond to your questions or request for information, we may collect and process the following information based on our legitimate interest:

Contact information (name, job title, phone number, email address)

We get your personal data from you directly or your employer.

You are not required to provide us with your personal data. However, if you do not provide your personal data, we will not be able to provide access to the restricted part of the Website to share documents relating to Novo Nordisk's smart insulin pens.

## **2 Confidentiality and information about Novo Nordisk's disclosure of your personal data to third parties**

Your personal data will be treated as confidential information by those, who are allowed to process the data, and will only be used for the purposes as set out above.

- Third parties engaged by Novo Nordisk (processors), such as IT service providers and consultants, may access your personal data. Such third parties include:
- Netcompany Group A/S
- Microsoft Corporation

Further, Novo Nordisk may share your personal data with our group entities worldwide, however only on a need to know basis.

The transfer of personal data between Novo Nordisk's group entities and service providers is based on either: the European Commission's standard contractual clauses, the destination country is deemed by the European Commission to have an adequate level of protection of personal data (which is the case for Canada) or Novo Nordisk's Binding Corporate Rules, available at <https://www.novonordisk.com/about-novo-nordisk/corporate-governance/personal-data-protection.html>. The reason is, that the level of data protection as currently applied and enforced in countries outside the European Union does not conform to the level of data protection for personal data currently applied and enforced within the European Union. You may request a copy of the data transfer agreement entered into between Novo Nordisk and its group entities or service providers by contacting us.

### 3 Storage and deletion

Your information is stored on the servers of Novo Nordisk and its third party processors.

If you have signed a contract with Novo Nordisk as an External Integrator, Novo Nordisk will keep your personal data as long as it is relevant for the purposes set out in section 1 above; unless Novo Nordisk is required under applicable law to keep your personal data for a longer or shorter period of time.

If you have not signed a contract with Novo Nordisk as an External Integrator, Novo Nordisk will keep your personal data for two years unless Novo Nordisk is required under applicable law to keep your personal data for a longer or shorter period of time.

### 4 Your Rights

As a data subject you have a number of rights, which you may use by contacting us. Please use the contact information set out in the beginning of this privacy notice.

Your rights are:

**The right to information.** You can obtain further information on the personal data, which we store and process about you by contacting us requesting access to your information.

**The right to a copy.** You can obtain a copy of your personal data in a structured, commonly used and machine-readable format by contacting us with this message.

**The right to object.** You can object to the processing of your personal data at any point in time by contacting us with this message.

**The right to rectify.** You can at any point in time request correction of your personal data by contacting us requesting that your information is rectified.

**The right to make a complaint.** If you have any complaints about Novo Nordisk's processing of your personal data, you may contact the Danish Data Protection Agency.

## **5 Data Protection Officer**

Our Data Protection Officer is available to answer all data protection questions at [privacy@novonordisk.com](mailto:privacy@novonordisk.com).

The Data Protection Officer together with its team is widely involved in all questions associated with protecting the personal data of our users. As trained experts, the data privacy team monitors our processing on an ongoing basis in order to ensure the best possible protection of your information.

## **6 Changes**

As technology and data protection and device legislation are constantly changing, we may have to change our policies from time to time. We will inform you of changes by appropriate means with an appropriate advance notice period.