

Notice of Personal Data Processing

NOTICE OF PERSONAL DATA PROCESSING

Novo Nordisk A/S 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 A/S
Novo Allé 1
2800 Bagsværd
Denmark
Company number: 24256790
Email: privacy@novonordisk.com
Tel: +45 4444 8888

You can always contact Novo Nordisk A/S or the Novo Nordisk Data Privacy Officer at privacy@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;
- From other Novo Nordisk entities;
- From vendors or consultants; and/or
- From VP Securities A/S

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We process personal data about you for the following purposes:

- To comply with legal requirements
- To offer shares and shareholder services
- To maintain and administer a register of shareholders in Novo Nordisk A/S
- To meet transparency obligations
- To coordinate conferences, events or annual general meetings
- To communicate with you as a shareholder and respond to your questions or request for information

You are not required to provide us with your personal data. If you do not want Novo Nordisk A/S to use your personal data for the above stated purposes, we will not be able to grant you the opportunity to acquire shares in Novo Nordisk A/S.

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 details and tax details);
- Government identification number;
- The number of shares held by you in Novo Nordisk A/S; and
- Details regarding dividend, interest or any other amounts paid to you with respect to your shareholding in Novo Nordisk A/S
- Video recordings of you from the webcasting of the Annual General Meeting

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 1 based on the following legal bases:

- The processing is necessary to fulfil a contract with you;
- The processing is necessary for our compliance with legal obligations;
- The processing is necessary for our legitimate interests. The legitimate interests are:
 - a. Ensuring effective communication with our shareholders;
 - b. Providing shares and shareholder services;
 - c. Conducting business in a responsible and commercially prudent manner; and
 - d. Preventing, investigating or detecting theft, fraud or other criminal activities.

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)
- Other Novo Nordisk entities (e.g. Novo Nordisk affiliates in other countries)
- Public authorities
- The webcast of the Annual General Meeting will be available on Novo Nordisk A/S' website

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/about-novo-nordisk/corporate-governance/personal-data-protection.html>
- 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;
- The EU-US Privacy Shield Framework for transfers to Privacy Shield-certified and US-based companies and organisations. More information and a list of Privacy

Shield-certified companies and organisations are available at <https://www.privacyshield.gov/welcome>.

8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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

- For as long as needed to provide you with the services requested by you
- For as long as required by applicable law
- With respect to webcast of the Annual General Meetings such will be stored for a period of approximately one year up until the following Annual General Meeting

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. Contact us as described in Section 1 with questions or requests relating to these rights.