

Privacy Notice

Your privacy

Novo Nordisk Research Centre Oxford Limited use personal data and human biosamples (HBS) for our Research and Development (R&D) activities. Personal data and HBS are crucial to help us search for and develop medicinal products and gain a better disease awareness, including new knowledge for the fight against diseases.

We therefore would like to thank all patients and research participants who have donated their personal data and HBS to us. See more on:

<https://www.novonordisk.com/science-and-technology/bioethics.html>.

Novo Nordisk is committed to being transparent about the use of your personal data and HBS and how to protect them. This Privacy Notice explains which category of personal information we collect, why we collect it, and 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 Privacy Notice and our obligations under applicable law.

This Privacy Notice is mainly relevant to you, if we are not able to identify you directly and provide you with a specific Privacy Notice. This is, e.g., the case where Novo Nordisk receives your personal data or HBS from our partners or research suppliers in a pseudonymized form only.

Who we are

The company responsible for processing your personal data or HBS is:

Novo Nordisk Research Centre Oxford Limited

Company number 09040089

[The innovation Building, Roosevelt Dr, Headington, Oxford OX3 7FZ, United Kingdom](#)

You can always contact Novo Nordisk Research Centre Oxford Limited at NNRCODATAPRIVACY@novonordisk.com with questions or concerns about how we process your specific personal data or HBS.

1. How we collect personal data or HBS

We get personal data or HBS from the following sources:

Universities

Hospitals and clinics

Research organisations

Suppliers and Partners we collaborate with

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Research institutions and practitioners as part of a Novo Nordisk sponsored study

Public and private databases

Data or HBS brokers

Social media platforms

Medical devices, apps and eDevices

Novo Nordisk entities

2. Why we process your personal data

We process personal data about you for the purpose of carrying out scientific research and to:

Generate new knowledge and insights

Identifying unmet medical needs, e.g., Epidemiological research

Plan how to do future studies, e.g., inclusion and exclusion criteria optimisation

Cross-study analyses of same disease or efficacy

Assessment of laboratory measurements to understand trends

Verify trends in demographics of subjects enrolled in trials, e.g., across trials to improve understanding of geographic and ethnic differences

Optimize access to medicines

Reuse of regulatory submission packages and other obligations to authorities

Use as control arm supplement, e.g., use of clinical data from an arm of one study as an arm in another study to reduce the needed enrolment of placebo subjects

Tool or analytical method development to advance research

Enhance safety signal interpretation, e.g., build models from in vitro/ vivo/ clinical trial data to predict safety

Develop disease modelling capabilities/biomarker development/development of assays or spectra

Develop statistical programming models, e.g., to enhance precision power

Use, develop, train, validate, test, monitor and improve Algorithms and Artificial intelligence (AI), e.g., for drug discovery, target discovery, health apps, medical eDevice and AI development

Health economics outcomes

Data sharing for research purposes, e.g., fulfil request to share coded or pseudonymised data and lab samples from a clinical trial with an external researcher or scientist

Research partnership

On-market (real world data) research

3. Types of personal data we process

For the purposes described in section 2, we will normally only process pseudonymized personal data. This means that we will not be able to directly identify you based on the data available. The pseudonymized personal data may include:

Information about health, e.g., imaging data, biomarkers, photos, videos and medical records

Demographic data such as age, gender and nationality

Information about race or ethnic origin

Information about religious beliefs

Information about sex life and sexual orientation

Information about use of a Novo Nordisk product or service, hereunder preferences

HBS that you have donated for use in R&D activities (e.g., blood, skin, hair, liquids, primary cells, stem cells, urine, tissues) and genetic data.

Metadata (e.g., for AI processing)

4. Why we are allowed to process your personal data

Our processing of your personal data requires a legal basis.

Depending on the data, we will process your personal data:

- because it is necessary for our legitimate interests in being able to conduct scientific research within the areas in which we operate (see more here: <https://www.novonordisk.com/science-and-technology/research-technologies.html>)
- To get insights on how our products and services are used, in order to further develop and improve existing and new products and make them available to patients across the globe
- In accordance with UK GDPR art. 6(1)(f), UK GDPR art. 9(2)(j).
- In each such case we have assessed that our legitimate purpose is not overwritten by your interests.

In some cases, the pseudonymized personal data we process about you will be based on your consent, which you have provided to the source from which we obtained your data, e.g., by the consent you have provided to our partners or research institutions or as part of a Novo Nordisk sponsored research study, cf. UK GDPR art. 6(1)(a) and UK GDPR art. 9(2)(a). In such a case Novo Nordisk ensures that any further use of your data for research purposes will be compatible with the original purpose for collecting the data.

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.

5. How we share your personal data

We may share your personal data with:

Suppliers and suppliers that assist our company (e.g., consultants, IT service providers, law firms, and Contract Research Organisations (CROs)).

Hospitals and clinics

Public authorities if needed

Other Novo Nordisk entities (e.g., Novo Nordisk entities in other countries)

In collaboration with other pharmaceutical or tech companies but only for research purposes

External researchers who are investigating the same or related disease area or drug product

Scientific writers, Medical and Scientific Journals, and data repositories

6. When do we transfer your personal data outside the UK

We implement appropriate safeguards to protect your personal data when it is transferred outside the United Kingdom (UK). Some countries outside the UK may not offer the same level of data protection as is required under UK law. To ensure your data remains secure, we apply one or more of the following safeguards, in accordance with legal requirements:

- **Intra-group transfers:** Personal data may be transferred from a Novo Nordisk entity in the UK to another Novo Nordisk entity outside the UK. These transfers are governed by Novo Nordisk's **Binding Corporate Rules**, which ensure a consistent level of protection across our global operations. You can access the Binding Corporate Rules here. [Novo Nordisk BCR](#)

- **Adequacy decisions:** In some cases, personal data is transferred to countries that the UK Information Commissioner's Office (ICO) has deemed to provide an adequate level of data protection.
- **International Data Transfer Agreements (IDTAs):** Where required, we have entered into IDTAs for transfers to third countries. You may request a copy of the relevant clauses by contacting us at **NNRCODATAPRIVACY@novonordisk.com**.
- **UK-US Data Bridge:** For transfers from the UK to the United States, we may rely on the **UK Extension to the EU-U.S. Data Privacy Framework**, also known as the **UK-US Data Bridge**, where applicable.
- **Standard Contractual Clauses (SCCs):** For transfers to countries outside both the UK and the European Economic Area (EEA), we may use the **EU Commission's Standard Contractual Clauses**, adopted on 4 June 2021, supplemented by the **UK International Data Transfer Addendum**.

7. How long we will keep your data

We will keep your pseudonymized personal data or HBS as long as relevant for the intended use for which it was collected or obtained and in accordance with Novo Nordisk's data retention and deletion procedures.

Examples:

HBS or data sourced from third parties will be kept as long as we are allowed, depending on the arrangement we have with our external parties. Sometimes it is for 3 years, but it can also go up to 15 years or more.

Pharmacovigilance data and regulatory documents relating to individual authorised medicinal products will be stored for as long as the marketing authorisation exists and for at least a further 10 years after the marketing authorisation has ceased to exist.

8. What are your rights

In general, you have the following rights:

You can get information of what identifiable 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 may request to have your personal data deleted or destroyed

You may request us stop or limit processing of your personal data

Where the personal data is collected on the basis of your consent you may withdraw your consent

Under applicable law, limits on these rights exist when data is processed purely for scientific purposes. This means that in such circumstances, the above rights on insight into the data, right to correction or destroy of data and right to stop processing are limited.

Contact us as described in section “Who we are” with questions or requests relating to these rights.

You can submit a complaint about how we process your personal data to the Information Commissioner’s Office (ICO) at <https://ico.org.uk/concerns/>.