

# Notice on processing personal data

## **1 Notice on processing personal data**

1.1 This notice on processing of personal data is addressed to:

- (a) the healthcare professionals with whom we create or maintain a relationship;
- (b) our customers or prospects who are natural persons (such as self-employed pharmacists);
- (c) the representatives or contact persons of our customers or prospects who are legal entities (such as wholesale pharmacists) or representatives from health care providers such as e.g. health insurance companies.

1.2 Nordisk Pharma Gulf FZ LLC and Novo Nordisk A/S is required by law to protect your personal data. This notice on processing of personal data explains how we collect, process, use, store and share your personal data. We will only process your personal data in accordance with this notice and in accordance with applicable law.

## **2 WHO ARE WE?**

2.1 The companies responsible for collecting and processing your personal data is:

2.2 [Insert affiliate legal entity and required contact information e.g.

Novo Nordisk Pharma Gulf FZ LLC

Dubai Healthcare City, Building 64, Block A, 4th floor,

Dubai, UAE

TRN# 100399888500003

and

Novo Nordisk A/S

Novo Alle 1

2880 Bagsværd

Company registration no. 24256790

“NN A/S”

together referred to as “we” or “us” )

2.3 You can always contact the Saudi Arabia Data Protection Responsible [KSAPRIVACY@novonordisk.com](mailto:KSAPRIVACY@novonordisk.com) with questions or concerns about how we process your personal data.

## **3 HOW DO WE COLLECT PERSONAL DATA ABOUT YOU?**

3.1 As part of the services you hereby grant us your consent and exclusive permission to collect and process your personal data from the following sources:

- (a) from you directly,
- (b) from publicly available publications, websites, or social media,
- (c) from vendors/providers that have prior received your consent to process your information,
- (d) from your usage and consumption of Novo Nordisk provided digital services and communications such as web-sites and emails.

## 4 WHY DO WE PROCESS YOUR PERSONAL DATA?

4.1 We always process your personal data for a specific purpose(s) and only process the type of personal data which is relevant to achieve that purpose(s). Personal data is collected only to the extent required. Under no circumstances are the collected data sold on to third parties for any reason.

4.2 Our processing of your personal data requires a legal basis. We will not process your personal data if we do not have a proper justification foreseen in the law for that purpose.

4.3 **General.** We process your personal data for the following general purposes as this is necessary for our legitimate interests and it does not unduly affect your interests or fundamental rights or freedoms:

- (a) for statistical purposes and to optimize the services we provide to you;
- (b) to manage our IT resources, including infrastructure management and business continuity and to optimise and track our activities (e.g. measuring interactions or sales, number of appointments/calls) as well as answering your requests and provide you with efficient support;
- (c) to invite you to events, congresses or meetings sponsored by us; or
- (d) to grant you access to restricted offerings such as password protected websites for professionals, and training modules allowing you to provide us with certain services (i.e. consultancy services);
- (e) to provide you with appropriate, adequate and updated information about diseases, drugs and other services; and
- (f) to send you surveys and communications regarding products, therapeutic areas or services that we promote.

4.4 **Compliance.** We process your personal data for the following compliance purposes as this is necessary to comply with our legal or regulatory obligations:

- (a) to manage our relationship with you, including validation of your professional accreditations (e.g. via third party databases);
- (b) to ensure compliance with legal requirements including: ensuring transparency of value transactions, product sample documentation, documentation regarding tax and deductions;
- (c) to respond to alleged cases of misconduct or fraud, to defending litigation, to conducting audits, and to ensure compliance in regard to mergers and acquisitions involving our company or group of companies; and
- (d) to manage and report adverse events and quality complaints, according to law.

4.5 **Contractual.** We process your personal data for the following purposes as the processing is necessary to perform our contractual obligations towards you, or to take pre-contractual steps at your request:

- (a) implementing tasks or preparation of or performance of existing contracts and for general record keeping; and
- (b) to ensure correct billing and invoicing.

4.6 **Profiling.** You have provided your explicit consent for processing of your personal data for profiling purposes. Your consent is the legal basis for profiling processing. As part of the profiling, we process your data for the following purposes:

- (a) to plan, manage and execute communications and interactions with you and to target and conduct segmentation activities to best address and anticipate your professional needs; and
- (b) to improve the quality of our interactions and services by adapting our offering to your specific needs.

## 5 WHAT PERSONAL DATA DO WE PROCESS ABOUT YOU?

5.1 **General, Compliance and Contractual purposes.** For the purposes described above in Section 4.3, 4.4 and 4.5 (General, Compliance and Contractual purposes) , we may process the following types of personal data:

- (a) general identification information (e.g. name, gender, contact details);
- (b) your function (e.g. title, position, name of company, department). For health care professionals: Health Care Professional ID, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organisations, engagements in therapies and treatment;
- (c) payment information (e.g. credit card details, bank account details, VAT or other tax identification number);
- (d) your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies,
- (e) information regarding your utilisation, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- (f) data you provide to us for example when you fill in forms or during events you attend, or when you answer questions during a conversation or in a survey;
- (g) data related to the services we provide to you; and information about the promotional, scientific and medical activities/interactions you have with us, including potential future interactions.

5.2 **Profiling.** For the purpose of profiling as described above in section 4.6 (Profiling), we may process the following types of personal data:

- (a) your function (e.g. title, position, name of company, department). For health care professionals: Health Care Professional ID, first specialty, second specialty, year of graduation from medical school, publications, congress activities, awards, biography, education, links to universities, expertise and participation in/contribution to clinical trials, guidelines, editorial boards and organisations, engagements in therapies and treatment;
- (b) your electronic identification data where required for the purpose of delivering products or services to our company (e.g. login, access right, passwords, badge number, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- (c) information regarding your utilisation, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- (d) data you provide to us for example when you fill in forms or during events you attend, or when you answer questions during a conversation or in a survey;
- (e) data related to the services we provide to you; and
- (f) information about the promotional, scientific and medical activities/interactions you have with us, including potential future interactions.

## 6 HOW DO WE SHARE YOUR PERSONAL DATA?

6.1 In the course of our activities and for the purposes set out under section 4, we may share your personal data with:

- (a) our personnel (including personnel, departments or other companies of the Novo Nordisk group of companies);
- (b) our independent agents or brokers (if any);
- (c) our suppliers and services providers that provide services and products to us;
- (d) our IT systems providers, cloud service providers, database providers and consultants;
- (e) our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;

- (f) any third party to whom we assign or novate any of our rights or obligations; and
- (g) our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

6.2 All third parties are contractually obliged to protect the confidentiality and security of your personal data, in compliance with applicable law.

6.3 Your personal data can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

## **7 DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EU/EAA?**

7.1 The personal data we collect from you may also be processed, accessed or stored in a country outside the Saudi Arabia for the purposes set out under section 5.

7.2 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:

- (a) 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>;
- (b) The destination countries are deemed by the EU Commission to have an adequate level of protection of personal data;
- (c) 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 2;

## **8 HOW LONG WILL WE KEEP YOUR PERSONAL DATA?**

8.1 We will only retain your personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

## **9 WHAT ARE YOUR RIGHTS?**

9.1 In general, you have the following rights and may:

- (a) Obtain an overview of what personal data we have about you,
- (b) obtain a copy of your personal data in a structured, commonly used and machine-readable format
- (c) request an update or correction to your personal data
- (d) request to have your personal data deleted or destroyed
- (e) request us to stop or limit processing of your personal data
- (f) You can submit a complaint about how we process your personal data to a Data Protection Authority.

9.2 You can withdraw your consent for our processing of your personal data for profiling purposes as set out in 4.6 at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.

9.3 You can use your rights, including withdraw your consent to [KSAPRIVACY@novonordisk.com](mailto:KSAPRIVACY@novonordisk.com)

9.4 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 2 with questions or requests relating to these rights.

[Apr 2021]