

Notice of Personal Data Processing

Introduction:

This Privacy Notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you when you contact iNovo call centre for placement of Novo Nordisk prescription order.

This privacy notice applies to personal information processed by or on behalf of Novo Nordisk Pakistan. We do not ask for any financial information from you such as credit card information or person bank account details.

Novo Nordisk Pakistan 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 on behalf of Novo Nordisk Pharma (Private) Limited :

Virtual World (Private) Limited
Plot # 7, Aitcheson Street, Raiwind Road
Thokar Niaz Baig, Lahore

You can always contact Novo Nordisk Pakistan or the NN Pakistan Data Privacy Responsible at privacypakistan@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 diabetes education service providers to whom you have provided your consent

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process your personal data for the following purposes:

- To fulfill and process your order and related invoice;
- Manage our relationship with you (e.g. through our databases);
- Evidence transactions and ensuring transparency on transfers of value;

Privacy Notice

- Provide you with appropriate, adequate and updated information about disease, drugs as well as our products and services;
- Improve the quality of our interactions and services by adapting our offering to your specific needs;
- Answer your requests and provide you with efficient support;
- Send you surveys (e.g. to help us improve your future interactions with us);
- Send you communications regarding products, therapeutic areas or services that we promote;
- Plan, manage and execute communications and interactions with you Track our activities (e.g. measuring interactions , /calls);
- Manage our IT resources, including infrastructure management and business continuity;
- Preserve the company's economic interests and ensure compliance and reporting (such as complying with our policies and local legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation and disclosing transfers of value as required by law, relevant authorities and/or industry codes of practice);
- Archiving and record keeping;
- Billing and invoicing; and
- Any other purposes imposed by law and authorities.

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:

- Your general and identification information (e.g. name, first name, last name, gender, email and/or postal address, CNIC, fixed and/or mobile phone number including sensitive information such as prescription and prescribed dose ;
- Information regarding your utilisation, responses and/or preferences including in terms of types of messages discussed, channels of communication and frequency;
- Data which relate to our products and services; and

5. WHY ARE WE ALLOWED BY LAW TO PROCESS YOUR PERSONAL DATA?

Personal data is collected only to the extent required. Under no circumstances are the collected data sold on to third parties for any reason.

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. Therefore, we will only process your personal data if:

- We have obtained your prior consent;
- The processing is necessary to perform our contractual obligations towards you or to take pre-contractual steps at your request;
- The processing is necessary to comply with our legal or regulatory obligations; or

Privacy Notice

- The processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

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. Examples of such 'legitimate interests' are data processing activities performed:

- To deliver Novo Nordisk prescribed products at your door step.
- To ensure that the right medicine according to a well-informed health care professional technical and professional opinion reaches the patient.
- To benefit from cost-effective services (e.g. we may opt to use certain platforms offered by suppliers to process data);
- To prevent fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
- To sell any part of our business or its assets or to enable the acquisition of all or part of our business or assets by a third party; and
- To meet our corporate and social responsibility objectives.

6. HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal data can be accessed by, or transferred to the following categories of recipients, on a need to know basis to achieve such purposes:

- Our personnel (including personnel, departments or other companies of the Novo Nordisk group);
- Our business partners who offer products or services jointly with us or with our subsidiaries or affiliates;
- Any third party to whom we assign or novate any of our rights or obligations; and
- Our advisors and external lawyers in the context of the sale or transfer of any part of our business or its assets.

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

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 PAKISTAN ?

The personal data we collect from you may also be processed, accessed or stored in a country outside Pakistan, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by (i) applying the level of protection required under the local data protection/privacy laws applicable to Pakistan, (ii) acting in accordance with our policies and standards and, (iii) for entities located in the European Economic Area (i.e. the EU Member States plus Iceland, Liechtenstein and Norway, the "EEA"), unless otherwise specified, only transferring your personal data on the basis of standard contractual clauses approved by the European Commission. You may request additional information in relation to international transfers of personal data and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section 9 below. For transfer to external companies based in United States of America, we ensure the EU-US Privacy Shield Framework for transfers to Privacy Shield-certified and US-based companies and organizations will apply. More information and a list of Privacy Shield-certified companies and organizations are available at <https://www.privacyshield.gov/welcome>. For intra-group transfers of personal data, the Novo Nordisk Group has adopted Binding Corporate Rules, a system of principles, rules and tools, provided by European law, in an effort to ensure effective levels of data protection relating to transfers of personal data outside the EEA and Switzerland. Read more about the Novo Nordisk Binding Corporate Rules at <https://www.novonordisk.com/about-novo-nordisk/corporate-governance/personal-data-protection.html>.

8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

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.

Personal data collected and processed in the context of a dispute are deleted or archived (i) as soon as an amicable settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

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 an update or correction to your personal data
- 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.

Privacy Notice

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.