

NOVEMBER 2024

# GENERAL PRIVACY NOTICE

## THE NOVO NORDISK FOUNDATION

This privacy notice explains how the Novo Nordisk Foundation (hereinafter “the Foundation”, “we”, “us” and “our”) processes your personal data. Our processing of your personal data is carried out in accordance with the European Union General Data Protection Regulation (GDPR) and the Danish Act on Data Protection.

### **DATA CONTROLLER**

The entity responsible for the processing your personal data is:

Novo Nordisk Foundation  
Tuborg Havnevej 19  
DK-2900 Hellerup  
Denmark  
CVR no.: 10582989  
E-mail: [persondatannf@novo.dk](mailto:persondatannf@novo.dk)  
Telephone: +45 3527 6600

## DESCRIPTION OF THE PROCESSING

### 1) Grant application and payment of grants

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
<p>Processing applications for grants from the Foundation and the payment of grants awarded to recipients (the “Purpose”)</p>	<p>We will process the following categories of personal data for the Purpose as the processing is necessary to fulfil our contractual obligations, cf. Article 6.1.b of the GDPR:</p> <ul style="list-style-type: none"> <li>name, e-mail address, telephone number, bank account details</li> </ul> <p>We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to process and assess your application for grants. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>Age, gender, CV information and data about previous research and publications, Open Researcher and Contributor ID (ORCID) iD</li> </ul> <p>We will also process your national identification number, such as the Danish social security number (CPR), as it is mandatory that we can identify you to ensure that payouts are made to the correct individual for taxation and bookkeeping purposes, cf. Section 11(2)(1) of the Danish Data Protection Act.</p> <p>We may process your health information, if you choose to provide it to us (e.g. if illness is listed as a reason for a delay in a project and a subsequent deferment of grant payouts), in which case we will process your health information on the</p>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> <li>directly from you; and</li> <li>online sources, such as Researchfish<sup>®</sup>.</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>suppliers and vendors, including information technology suppliers, under our instruction and financial institutions with which we collaborate to assist the Foundation; and</li> <li>the Danish Customs and Tax Administration and other public authorities to the extent that we are obligated to do so.</li> </ul> <p>In instances where we are collaborating with other foundations or donors on a call or funding instrument, the grant application may be</p>	<p>We will store personal data for as long as is necessary to fulfil the purpose for which the personal data is collected, meaning the following.</p> <ul style="list-style-type: none"> <li>Data on unsuccessful applications will be stored for up to two years following final rejection. In some cases, the personal data may be necessary for the purpose of Impact analysis and reporting, in which the personal data will be stored for up to 50.</li> <li>Data on successful applications will be stored as described below under “Grant administration and impact assessment”.</li> </ul>

	<p>basis of Article 9.2.f of the GDPR, as it may be necessary in order to establish, exercise or defend a legal claim.</p> <p>Data on unsuccessful applications may be retained beyond the standard retention period on the basis of the Novo Nordisk Foundation's legitimate interests, cf. Article 6.1.f of the GDPR. Thereafter, the data will be transferred to the Foundation's archives in which the data will be processed in accordance with the policy on processing data for archiving purposes.</p>		shared with those partners.	
--	--	--	-----------------------------	--

## 2) Grant administration and impact assessment

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
<p>Follow-up of recipients of grants from the Foundation to assess the impact of Foundation grants and associated statistical research, including analysis and secondary research projects measuring on different parameters, e.g. equality and diversity, in funding across scientific fields * (the "Purpose")</p>	<p>We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to demonstrate the value and impact of research in relation to grants and other activities, and improving funding strategies to enhance equality and diversity through funding processes. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>name, e-mail address, telephone number, gender, birth year, age, city and country of residence, ORCID iD, data on the progress of the research project that is funded and the type of research project that is funded</li> </ul>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> <li>directly from you;</li> <li>online sources, such as Researchfish<sup>†</sup>; and</li> <li>the Novo Nordisk Foundation's application systems.</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>suppliers and vendors, including information technology suppliers, support, and financial institutions with which we collaborate to assist the Foundation;</li> <li>third parties in association with a research project, including independent national and</li> </ul>	<ul style="list-style-type: none"> <li>Data will be stored throughout the period covered by a grant from the Foundation for up to at least 50 years for the purpose of Impact analysis and reporting on the basis of the Novo Nordisk Foundation's legitimate interests, cf. Article 6.1.f of the GDPR.</li> <li>Thereafter, the data will be transferred to the Foundation's archives, in which the data will be processed in accordance with the policies on processing data for archiving purposes.</li> </ul>

	<p>We will also process your health data if you choose to provide it to us (e.g., if illness is listed as a reason for a delay in a project and a subsequent deferment of grant payouts), in which case we will process your health information on the basis of Article 9.2.f of the GDPR, as it may be necessary in order to establish, exercise or defend a legal claim.</p> <p>We will also process your national identification number (CPR), as it is mandatory that we can identify you to ensure that payouts are made to the correct individual for taxation and bookkeeping purposes, cf. Section 11(2)(1) of the Danish Data Protection Act.</p> <p>Certain categories of personal data are not relevant for the research projects and will be anonymized prior to carrying out the research activities.</p>		<p>international research collaboration parties, IT suppliers hosting relevant systems and platforms, and third parties carrying out research activities on behalf of the Foundation to support the research projects; and</p> <ul style="list-style-type: none"> <li>• companies in the Novo Nordisk Foundation Group such as Novo Holdings A/S, which is responsible for certain administrative tasks on the Foundation's behalf.</li> </ul> <p>Certain research projects entail joint controllership between the Novo Nordisk Foundation and the collaboration parties in relation to specific personal data processing activities. In such cases, a joint controller agreement is entered into between the parties involved in the research project. **</p>	<ul style="list-style-type: none"> <li>• Personal data processed for research purposes will be retained for as long as necessary for the research purpose and will be reconsidered after 50 years.</li> </ul>
--	--	--	---	---

\*\*The Novo Nordisk Foundation, as a member of Research on Research Institute (RoRI), has access to the Funder Data Platform (FDP). Here partners can upload and grant access to data for the purpose of collaborative research projects. All RoRI projects run on the FDP have the necessary collaboration and data sharing agreements.

The CRITERIA Project is a specific RoRI project in which the Novo Nordisk Foundation, Wellcome Trust, the Universities of Leiden and Sheffield, and the India Alliance are joint controllers for certain personal data processing activities, such as uploading to the research platform specifically agreed categories of personal data of relevance to the research project. The parties have agreed that despite joint controllership due to joint determination of the purposes and means of processing, it is an obligation for each party to ensure that the specific collection and upload of personal data carried out by the party concerned is in compliance with data protection legislation. The party concerned is also responsible for the follow-up on the rights of the data subjects affected by said processing activities.

The privacy notices of the other joint controllers are available at:

Wellcome Trust: <https://wellcome.org/who-we-are/privacy-and-terms>

University of Leiden: <https://www.organisatiegids.universiteitleiden.nl/en/regulations/general/privacy-statements>

University of Sheffield: <https://www.sheffield.ac.uk/govern/data-protection/privacy>

India Alliance: <https://www.indiaalliance.org/privacy>

The Novo Nordisk Foundation additionally provides information on some funded grants to Danmarks Forskningsportal (Research Portal Denmark). The privacy notice for the Portal is available at <https://forskningsportal.dk/about-the-portal/availability-personal-data-cookies>.

### 3) Administration of committees

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
Administration of committees (the "Purpose")	We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to ensure that the right committee members are appointed and to administer the conditions for committee members' appointment. We have	We collect data from the following sources: <ul style="list-style-type: none"> <li>directly from you.</li> </ul>	We may share your personal data with: <ul style="list-style-type: none"> <li>suppliers and vendors, including information</li> </ul>	<ul style="list-style-type: none"> <li>Data will be stored throughout the period in which a person is a member of a Foundation committee and for five years following the end of the year in</li> </ul>

	<p>assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>• CV information and data on career progress and the results achieved</li> </ul> <p>As committee members are closely associated with the Novo Nordisk Foundation, similar to how employees are associated to their employer, photographs published on the website identifying committee members do not require the consent of the individuals but is rather based on the legitimate interest of the Foundation in identifying appointed committee members internally and externally, cf. Article 6.1.f. If, however, photographs are taken during events or otherwise in situations where the individual is in a working capacity as a committee member, consent, cf. Article 6.1.a. will be the legal basis of processing.</p> <p>We will process the following categories of personal data for the Purpose as the processing is necessary to fulfil our contractual obligations, cf. Article 6.1.b of the GDPR:</p> <ul style="list-style-type: none"> <li>• name, e-mail address, telephone number, bank account details, information on remuneration</li> </ul> <p>We will process the following categories of personal data for the Purpose as the processing is required by law as a legal obligation that applies to us, cf. Article 6.1.c of the GDPR:</p> <ul style="list-style-type: none"> <li>• Tax ID and fiscal code and copy of passport for non-Danish nationals</li> </ul> <p>We will also process your national identification number (CPR), as it is mandatory that we can identify you to ensure that payouts are made to the correct individual for taxation</p>		<p>technology suppliers, support, suppliers of goods and financial institutions with which we collaborate to assist the Foundation;</p> <ul style="list-style-type: none"> <li>• companies in the Novo Nordisk Foundation Group such as Novo Holdings A/S, which is responsible for certain administrative tasks on the Foundation's behalf; and</li> <li>• the Danish Customs and Tax Administration and other public authorities to the extent that we are obligated to do so.</li> </ul>	<p>which the agreement with the Foundation ends.</p> <ul style="list-style-type: none"> <li>• Data connected to the processing of individual grant applications to the Foundation will be stored as described above.</li> </ul>
--	--	--	---	---

	<p>and bookkeeping purposes, cf. Section 11(2)(1) of the Danish Data Protection Act.</p> <p>We will also process your health data if you choose to provide it to us (e.g. if illness is listed as a reason for a delay in a project), in which case we will process your health information on the basis of Article 9.2.f of the GDPR, as it may be necessary in order to establish, exercise or defend a legal claim.</p>			
--	--	--	--	--

#### 4) Administration of business relationships

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
Administration of business relationships (the "Purpose")	<p>We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to identify you and communicate with you. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>name, e-mail address, telephone number and workplace</li> </ul> <p>We will process the following categories of personal data for the Purpose, as the processing is necessary to fulfil our contractual obligations, e.g. in relation to consultancy agreements, cf. Article 6.1.b of the GDPR:</p>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> <li>directly from you</li> <li>public sources</li> <li>from your employer.</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>suppliers and vendors, including information technology suppliers, support, suppliers of goods and financial institutions with which we collaborate to assist the Foundation; and</li> <li>companies in the Novo Nordisk</li> </ul>	<p>Data will be stored for as long as we have a business relationship with you and for five years following the end of the year in which the agreement with the Foundation ends.</p>

	<ul style="list-style-type: none"> <li>CVs and other information about competences and relevant working experience</li> </ul>		<p>Foundation Group such as Novo Holdings A/S, which is responsible for certain administrative tasks on the Foundation's behalf.</p>	
--	---	--	--	--

## 5) Communications and events

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
Administration of social media presence and the Novo Nordisk Foundation's own webpages, as well as information sharing and publication of newsletters	<p>We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to communicate effectively. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>name, e-mail address, telephone number and workplace, user identification (user names or similar), IP-addresses, picture, age/birthday, CV, publications and academic work, address, education, employment data, gender, interests, qualifications and awards/prizes, ORCID iD and preferences, job title, cookie information, tracking pixels information, activities, preferences, interests</li> </ul> <p>With regards to newsletter and sharing of information, consent, cf. Article 6.1.a. will be the legal basis of processing.</p>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> <li>directly from you</li> <li>public sources and</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>suppliers and vendors, including information technology suppliers, support, and suppliers of communication services with which we collaborate to assist the Foundation</li> </ul>	<p>We will store personal data for as long as is necessary to fulfil the purpose for which the personal data is collected.</p>



<p>Hosting seminars, workshops and other events</p>	<p>We will process the following categories of personal data for the Purpose, based on our legitimate interests, cf. Article 6.1.f of the GDPR, in being able to conduct and host events to promote, facilitate and improve research on relevant topics. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms:</p> <ul style="list-style-type: none"> <li>• name, email addresses, user identification (user names or similar), phone numbers, contact information, picture, age/birthday, CV, publications, address, education, recordings, gender, interests, qualifications and awards,</li> </ul> <p>Article 6(1)(a) of the GDPR (processing based on the consent from the data subjects); this consent comprises the Novo Nordisk Foundation's ability to host the events effectively. The data subjects are informed hereon in accordance with applicable legislation.</p> <p>To the extent event logistics require processing health information (e.g. allergies) or information about religious beliefs (e.g. no travel on specific days), we will process such sensitive personal data on the basis of your consent, cf. Article 9.2.a of the GDPR.</p>	<p>We collect data from the following sources:</p> <ul style="list-style-type: none"> <li>• directly from you</li> </ul>	<p>We may share your personal data with:</p> <ul style="list-style-type: none"> <li>• suppliers and vendors, including information technology suppliers, support, suppliers of goods and event planning organisations with which we collaborate to assist the Foundation; and</li> <li>• third parties that might have an important role in the event or relation to other co-hosts or business partners in connection with the events.</li> <li>• other participants in the event or related events</li> </ul>	<p>We will store personal data for as long as is necessary to fulfil the purpose for which the personal data is collected.</p>
---	---	--	---	--

\* Secondary use of personal data

## NOTICE TO INDIVIDUALS WHOM HAVE PREVIOUSLY RECEIVED GRANTS

This part of the Privacy Notice is only relevant to you, if you have previously received grants from the Novo Nordisk Foundation and we have not at the time of collecting your personal data informed you about the use of your personal data for the purpose of secondary data analysis in relation to

examining equity in funding processes regarding gender to account for differences in publication track record. We may not be able to contact you directly to inform you about the secondary use purpose, because your contact information may be outdated or not available to us.

We hereby inform you of the secondary use purposes of your personal data which we have collected from you as part of research funded by the Novo Nordisk Foundation through grants, or as collected through a shared platform from third party funders.

The following information about you will be processed for the purpose of pooling data to improve our understanding of inequalities in funding for genders and scientific fields, on the basis of our legitimate interest in being able to improve funding strategies to enhance equality and diversity through funding processes, cf. Article 6.1.f. of the GDPR:

- Full name
- Initials
- ORCID iD
- Email
- Gender
- City and country of residence
- Birth year

We will share this personal data with other funders and RoRi through the FDP, as mentioned in section 2.2 above. Your data may be transferred outside the EU/EEA for the purpose listed above. In case of such transfer, the transfer will comply with the requirements as set out in Chapter V of the GDPR, and will apply an appropriate basis for transfer, e.g. Commission's standard contractual clauses as applicable.

Please refer to sections 4 and 5 below for further information about confidentiality and your rights.

## **TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA**

In some cases, we may transfer personal data to our IT service providers and/or other third-party supplier in countries outside the EU/EEA, including:

- United States, The Philippines, Canada, and the United Kingdom

The European Commission may not have deemed the countries to have an adequate level of protection of personal data. We will ensure a legal basis for the transfer, such as by providing appropriate safeguards for the transfer through the use of model clauses for the transfer of personal data to third countries, as published by the European Commission. You may obtain a copy of these model clauses by contacting us at [persondatannf@novo.dk](mailto:persondatannf@novo.dk).

## **CONFIDENTIALITY**

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 purpose(s) as set out in this privacy notice.

## YOUR RIGHTS

You have the following rights:

- You have a right to obtain further information about how the personal data which the Foundation processes and stores about you and you may be entitled to obtain a copy of your personal data
- You have the right to object to the processing of your personal data and have the processing of your personal data restricted. In particular, you have an unconditional right to object to the processing of your personal data for direct marketing purposes.
- If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.
- You have the right to receive your personal information in a structured, commonly used and machine-readable format (data portability).
- You may always lodge a complaint with a data protection supervisory authority, such as the Danish Data Protection Agency.

There may be conditions or limitations on these rights. For example, you may not have the right to data portability in certain circumstances depending on the data format and processing activity.

You may take steps to exercise your rights by contacting us at [persondatanf@novo.dk](mailto:persondatanf@novo.dk).

*Last updated 01 November 2024*