

PRIVACY NOTICE NOVO NORDISK FOUNDATION

The Novo Nordisk Foundation is committed to protecting the privacy and security of your personal data in compliance with all applicable data protection and privacy laws, including the European Union General Data Protection Regulation (GDPR) and the Danish Act on Data Protection. This privacy notice explains how, and on what basis, the Novo Nordisk Foundation (“the Foundation”, “we”, “us” or “our”) collects, stores, and uses your personal data.

For ease of reference, we have organized this privacy notice into two sections:

- **Section A (General Activities) applies when: you visit our websites; attend or work at our premises; participate in any of our events; or otherwise have a business relationship or interaction with us.**
- **Section B (Grant Giving Activities) applies when: you apply for any of our grants; are a grant holder or collaborator on an existing grant; are nominated for or receive a prize from us; or act as an external committee member or peer reviewer.**

Information on how we collect, store and use personal data of job applicants and as part of our recruitment activities is available in our [Privacy Notice for Job Applicants](#). Information on how we collect, store and use the personal data of Foundation employees is set out in our HR Administration Privacy Notice, available on our employee Intranet site. A separate privacy notice for our confidential reporting channel is also available on our [reporting system](#).

It is important that you read this privacy notice, together with any other privacy notice we may provide on specific occasions when we are collecting or using personal data about you, so that you are aware of how and why we are using your personal data. We will review and update this privacy notice as necessary, so please check from time to time for any updates.

DATA CONTROLLER

We are the “data controller” of your personal data, which means we are responsible for deciding how we hold and use personal data about you:

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

PERSONAL DATA

Your personal data is any information about you from which you can be identified. This excludes anonymous or de-identified data from which you cannot be identified. We will only process your personal data in accordance with this privacy notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you is adequate, relevant, not excessive, and processed for limited purposes only.

A. GENERAL ACTIVITIES

Visitors to our website and engaging with us via email, phone or social media

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>When you visit our website, www.novonordiskfonden.dk, certain technical information relating to you and your device will be collected automatically, such as:</p> <ul style="list-style-type: none">• the Internet Protocol (IP) address used to connect your computer to the Internet;• browser type and version;• page interaction information; and• cookies, in accordance with our Cookie Policy. <p>You may also choose to give us certain personal identification information (e.g., name and contact details) through our website when you subscribe to our publications, newsletters and updates.</p> <p>If you choose to contact us by email, phone or social media, we may collect your personal identification information (e.g., name and contact details) directly from you or public sources (e.g., your social media profile if you engage with us via social media).</p>	<p>We collect this data:</p> <ul style="list-style-type: none">• to improve your user experience and the functionality of our website, remember your preferences, compile statistics, analyze traffic, and provide access to social media features;• to send you publications, newsletters and updates, if you have chosen to receive these from us; and• to be able to identify and communicate with you, if you have chosen to engage with us via email, phone or social media. <p>Our legal basis for processing personal data about you relating to cookies or when you choose to subscribe to our publications, newsletters and updates is your explicit consent. You have the right to withdraw your consent at any time by clicking the cookie icon in the footer of our website or choosing 'unsubscribe' in the emailed publications sent to you.</p> <p>For data collected automatically through our website, including those cookies which are strictly necessary for the functionality of the website, our processing is based on our legitimate interests in making a well-functioning website available which, in our view, are not overridden by your fundamental rights and freedoms as provided under the GDPR.</p>

Visitors to our premises and individuals working on behalf of the Foundation

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>When you visit our premises or work for or on behalf of the Foundation as a non-Foundation employee (e.g., as an individual contractor or consultant, professional advisor or supplier), we will collect personal identification information (e.g., name and contact details) and if applicable, professional information (e.g., job title and employer information) directly from you, your employer, or public sources (e.g., your employer’s website).</p> <p>For the purposes of individual contractor or consultancy agreements, we may also collect professional and academic information from you (e.g., academic and professional background, and research and publication history).</p> <p>If you are taken unwell or injured at our premises, we may also collect information from you related to your illness or injury for the purposes of recording and managing first aid.</p>	<p>We collect this data:</p> <ul style="list-style-type: none"> • to be able to identify and communicate with you; • to provide you with access to our premises, Intranet and IT systems, as required; and • where applicable, to assess competencies and relevant work experience. <p>Our legal basis for processing personal data about you as a visitor to our premises is to pursue our legitimate interests in ensuring the safety and security of our premises which, in our view, are not overridden by your fundamental rights and freedoms.</p> <p>Processing data for the purposes of e.g., individual contractor, consultancy or supplier agreements is necessary to fulfil our contractual obligations.</p> <p>In certain cases, this data may also be necessary for ensuring compliance with applicable legal and regulatory requirements.</p>

Invitations to, or attendance at, events, conferences or meetings organized by the Foundation

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>If you are invited to, register, or attend an event, conference or meeting organized by us, we may collect your:</p> <ul style="list-style-type: none"> • personal identification information (e.g., name, contact details, and photo); and • professional and academic information (e.g., academic and professional background, and research and publication history). 	<p>We collect this data to identify and communicate with you in connection with the event or meeting, effectively host the event/meeting (including to enhance, modify or improve our future events/meetings), and provide you with access to our premises (as applicable).</p> <p>We process this data based on our legitimate interests in being able to conduct and host events to promote, facilitate and improve collaboration on relevant topics. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms. This information may also be necessary to</p>

<p>We collect this information directly from you or public sources (e.g., websites and social media sites, to invite you to events).</p> <p>Contingent on the event or meeting, we may also require your health information (e.g., related to allergies or information about any special access or attendance requirements).</p>	<p>fulfil our contractual obligations to you (e.g., if you have booked attendance at an event).</p> <p>If you have requested to hear from us (e.g., through subscription to our newsletters, publications and updates) our legal basis for processing information about you is based on your explicit consent. You have the right to withdraw your consent at any time by choosing 'unsubscribe' in the email publications sent to you.</p> <p>To the extent event logistics require processing photos of you or your health information, we will process such personal data based on your explicit consent.</p>
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B. GRANT-GIVING ACTIVITIES

Grant applicants and payment of grants

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>When you apply for a Foundation grant (e.g., as an applicant, principal investigator or collaborator on a project proposal) or make an unsolicited inquiry (expression of interest) regarding a project idea, we will collect your:</p> <ul style="list-style-type: none"> personal identification information (e.g., name, date of birth, contact details, address, nationality and gender); and professional and academic information (e.g., academic and professional background, and research and publication history). <p>If you are awarded a Foundation grant, we will also collect your:</p> <ul style="list-style-type: none"> financial information (e.g., bank account details); and personal identification information (e.g., national identification number, such as Danish social security number (CPR) and passport information) for the purposes of identification. 	<p>We collect this data to:</p> <ul style="list-style-type: none"> identify and communicate with you in relation to your application or inquiry; process your application; assess your eligibility for a grant award; administer, manage and monitor the award of grant funds; and undertake research, reporting and analysis (e.g., in relation to impact and performance). <p>We process this data based on our legitimate interests in being able to process and administer grant applications and awards. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms.</p> <p>This information may also be necessary to fulfil our contractual obligations to you (e.g., if your application is successful and we enter into a grant agreement with you).</p>

<p>We may collect this information directly from you, our grant management systems and where necessary, online sources (e.g., publicly or privately curated databases) and external committee members or peer reviewers.</p> <p>We may also process your health information, but only if you choose to provide it to us (e.g., if health reasons are provided as a reason for delay in a project and subsequent deferment of grant payments, or if you consider it necessary for the purposes of our assessment of your application).</p>	<p>In certain cases, this information may also be necessary for ensuring compliance with applicable legal and regulatory requirements (e.g., taxation, bookkeeping and due diligence/KYC requirements).</p> <p>We process information relating to your gender based on your explicit consent, whereby you can choose not to provide this information to us.</p>
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Grant holders and collaborators on existing grants

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>In addition to the personal data we collect when you apply for a grant (see Section B (Grant applicants and payment of grants)), we may collect directly from you, our grant management systems, and external committee members or peer reviewers:</p> <ul style="list-style-type: none"> information on progress of the funded project, including spend information, type of research, and related impact and performance parameters (which may include grant recipient personal data); and digital and administrative information (e.g., user account registration information, and any correspondence, requests or administrative changes during the life of the grant). <p>For research and reporting, wherever feasible, certain categories of personal data not relevant for these purposes will be anonymized prior to carrying out the activities.</p>	<p>We collect this data to:</p> <ul style="list-style-type: none"> identify and communicate with you in relation to your grant; administer, manage and monitor your grant, including the distribution of grant funds; and undertake research, reporting and analysis (e.g., in relation to impact and performance). <p>We process this data based on our legitimate interests in being able to administer and manage grants and awards and in being able to demonstrate the value and impact of research in relation to grants and other activities (including to improve funding strategies). We have assessed that our legitimate interests override your interests or fundamental rights and freedoms.</p> <p>This information may also be necessary to fulfil our contractual obligations to you (e.g., fulfilment of obligations under our grant agreements).</p> <p>In certain cases, this information may also be necessary for ensuring compliance with applicable legal and regulatory requirements (e.g., taxation, bookkeeping and due diligence/KYC requirements).</p>

Nominations for prizes and prize recipients

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>If you nominate an individual researcher for a Foundation prize, we will collect your personal identification information directly from you (e.g., name and contact details). We will also collect from you, peer researchers and research institutions, and online sources (e.g., publicly and privately curated databases) the following personal data related to your nominee:</p> <ul style="list-style-type: none"> • personal identification information (e.g., name and contact details); and • professional and academic information (e.g., academic and professional background, and research and publication history). <p>If you are awarded a prize, in addition to your personal data provided by your nominator, we will also collect directly from you:</p> <ul style="list-style-type: none"> • financial information (e.g., bank account details); and • personal identification information (e.g., national identification number, such as Danish social security number (CPR) and passport information) for identification. <p>Post-award, we may also collect the following information from our grant management systems, which may include prize recipient personal data:</p> <ul style="list-style-type: none"> • information on progress of the funded project, including type of research and related impact and performance parameters; • grant spend information; and • digital and administrative information (e.g., user account registration information and correspondence or administrative changes during the life of the award). <p>For research and reporting, wherever feasible, certain categories of personal data not relevant for these purposes will be anonymized prior to carrying out the activities.</p>	<p>We collect this data to:</p> <ul style="list-style-type: none"> • identify and communicate with you (either nominator or nominee) in relation to the nomination; • process the nomination application; • assess eligibility for the award of a prize; • as applicable, administer and manage the prize, including payments related to the prize; and • as applicable, undertake research and reporting (e.g., for impact, performance and monitoring purposes). <p>We process this data based on our legitimate interests in being able to process and administer prize nominations and awards. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms.</p> <p>This information may also be necessary to fulfil our contractual obligations to you (e.g., if your nomination is successful and you receive a prize award).</p> <p>In certain cases, this information may also be necessary for ensuring compliance with applicable legal and regulatory requirements (e.g., taxation, bookkeeping and due diligence/KYC requirements).</p>

External committee members and peer reviewers

What personal data do we collect and how do we collect it?	What do we use it for and on what legal basis?
<p>If you are applying for the role of, or are invited to be, an external committee member or peer reviewer with respect to any Foundation-funded grants or prizes, we may collect directly from you and online sources (e.g., publicly or privately curated databases) your:</p> <ul style="list-style-type: none"> personal identification information (e.g., name, contact details, and photo); and professional and academic information (e.g., academic and professional background, and research and publication history). <p>Additionally, for remuneration purposes, we will collect your:</p> <ul style="list-style-type: none"> financial information (e.g., bank account details); and personal identification information (e.g., national identification number, such as Danish social security number (CPR) and passport information) for the purposes of identification. 	<p>We collect this data to:</p> <ul style="list-style-type: none"> identify and communicate with you; determine your eligibility and suitability to be a committee member or peer reviewer, including assessing any relevant prior professional relationships between you and grant applicants or their institutions; and administer the conditions for your appointment (including payments). <p>We process this data based on our legitimate interests in ensuring appropriate grant review, selection and monitoring. We have assessed that our legitimate interests override your interests or fundamental rights and freedoms.</p> <p>This information may also be necessary to fulfil our contractual obligations to you (e.g., as part of your appointment as a committee member or peer reviewer).</p> <p>In certain cases, this information may also be necessary for ensuring compliance with applicable legal and regulatory requirements (e.g., taxation, bookkeeping and due diligence/KYC requirements).</p>

WHO WE SHARE YOUR PERSONAL DATA WITH

Where necessary for the purposes described in this privacy notice, we may share your personal data within the Foundation and with 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.

We may also share your personal data for the purposes described in this privacy notice with:

- third-party service providers who perform services on our behalf, including information technology suppliers and system providers, professional advisors and consultants;
- external researchers and research organisations, including platforms, databases and portals;

- event planning organisations with which we collaborate, including co-hosts, event venues and other participants in connection with events, conferences or meetings organized by the Foundation;
- organisations responsible for grant administration;
- external committee members or peer reviewers; and
- other foundations, partner organisations or donors (e.g., where we are collaborating, or proposing to collaborate, on a grant).

In limited circumstances, we will also share your personal data if required to do so by law or to enforce or defend our legal rights.

SPECIAL CATEGORIES OF PERSONAL DATA

“Special categories” of personal data that we may hold about you require higher levels of protection under data protection laws and we need further justification for collecting, storing and using this type of personal data.

We collect the following types of special category personal data and use them for the purposes and legal bases set out below:

- Data related to your health where you are taken unwell or injured at our premises. This information is only used to record and manage first aid and is used on the basis that we are legally required to do so or, in some cases, because it is necessary to protect someone’s vital interests where they are incapable of giving consent.
- Dietary or related health data, including information about any special access or attendance requirements for an event, conference or meeting we are hosting, or in association with a grant application or existing grant (e.g., if health reasons are provided as a reason for delay in a project and subsequent deferment of grant payments, or if you consider it necessary for the purposes of our assessment of your application). This information is used to ensure your access and dietary/health requirements are met, or for the purposes of assessing and administering a grant, on the basis that you consent to providing this information to us.

HOW WE LOOK AFTER YOUR PERSONAL DATA

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors and other third parties that have a legitimate business need for such access.

We require all third parties (including our third-party vendors and service providers) with whom we need to share your personal data, by written contract, to implement appropriate security measures to protect your personal data consistent with our policies and any applicable data security obligations. We

do not permit third parties who process your personal data on our behalf to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes in accordance with our instructions.

HOW LONG WE STORE YOUR PERSONAL DATA FOR

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it. To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means. For successful grant applications, personal data will be stored throughout the period covered by a grant and thereafter processed for archival purposes in the public interest, for scientific or historical research purposes, or for statistical purposes. Personal data related to unsuccessful grant applications will be stored for up to two years following final rejection.

We securely erase your personal data once it is no longer needed. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Details of retention periods for different aspects of your personal data are set out in our Personal Data Storage Policy. Contact personaldatannf@novo.dk for further information.

TRANSFERS OF PERSONAL DATA TO COUNTRIES OUTSIDE THE EU/EEA

In some cases, where permitted by applicable law and as necessary for the purposes outlined above, personal data about you may be transferred to countries outside the EU/EEA that may not be deemed to provide the same level of data protection as your home country. In these circumstances, we will ensure that adequate protections are in place to protect your personal data. For example, we may require recipients to enter into the European Commission's Standard Contractual Clauses (SCCs) or other appropriate contractual arrangements where necessary. We will ensure the implementation of these additional safeguards on a case-by-case basis.

YOUR RIGHTS

We are committed to protecting your personal data and safeguarding your rights. Subject to applicable data protection laws, you enjoy the rights described below. However, some rights apply only in certain circumstances. The Danish Data Protection Agency has issued guidance on the rights of data subjects. For details about your rights, please see [here](#) (in Danish).

- You have the right to request access to, and receive a copy of, the personal data that we are processing about you and, in this context, also to receive additional information.
- You have a right to have incorrect personal data about yourself rectified and to have incomplete personal data completed.
- You have the right to request that personal data about you be deleted in certain circumstances, e.g. if processing is based on your consent and you choose to withdraw that consent.
- You have a right to have the processing of personal data about you restricted, e.g. if the accuracy of the personal data is contested.
- Where our processing is done automatically and is based on your consent or the performance of an agreement with you, you have the right to request to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format and to request the transmission, where technically feasible, of such data to another controller.
- You may object to the processing of personal data about you by us, including in particular in relation to direct marketing.
- You may withdraw your consent to the processing of your personal data at any time. Withdrawal of your consent will not affect the processing of your personal data that took place before the date of your withdrawal.

Although we hope that you will contact the Foundation first with any concerns you may have, you also have the right to make a complaint to the Danish Data Protection Authority or your local data protection authority (see [here](#)).

If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact us at persondatannf@novo.dk. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal data that we hold about you, or we may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

AUTOMATED DECISION MAKING

You will not be subject to decisions that have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

CONTACT US

Please contact persondatannf@novo.dk if you have any questions regarding the protection of your personal data or if you wish to exercise any of your legal rights.

This privacy notice was last updated in March 2026.