

# PRIVACY NOTICE

## Novo Nordisk FOUNDATION

This privacy notice explains how the Novo Nordisk Foundation (hereinafter “the Foundation”, “we”, “us” and “our”) processes your personal data, e.g. in connection with processing applications to the Foundation and the payment of grants awarded. Our processing of your personal data is carried out in accordance with the European Union General Data Processing Regulation and Danish legislation.

### 1 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  
 Telephone: +45 3527 6600

### 2 DESCRIPTION OF THE PROCESSING

#### 2.1 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
Processing applications for grants from the Foundation and the payment of grants awarded to recipients (the “Purpose”)	<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 as the processing is required by law as a legal obligation that applies to us, cf. Article 6.1.c of the GDPR:</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®.</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> </ul>	<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 2 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 years, for this specific</li> </ul>

	<ul style="list-style-type: none"> <li>• Tax ID and fiscal code</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, ORCID</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 and bookkeeping purposes, cf. Section 11(2)(1) of the Danish Data Protection Act. 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 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>		<ul style="list-style-type: none"> <li>• the Danish Customs and Tax Administration and other public authorities to the extent that we are obligated to do so.</li> </ul>	<p>purpose and 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> <ul style="list-style-type: none"> <li>• Data on successful applications will be stored as described below under 2.2. "Grant administration and impact assessment".</li> </ul>
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## 2.2 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 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®; 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>• RoRi and other third parties in association with a research project,</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>including IT suppliers hosting relevant systems and platforms 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>	
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### 2.3 Administration of committee members

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
<p>Administration of committee members (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 ensure that the right committee members are appointed and to administer the conditions for committee members' appointment. We have 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 does 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 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 financial institutions with which we collaborate to assist the Foundation;</li> <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</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 5 years following the end of the year in which the agreement with the Foundation ends.</li> <li>• Data connected to the processing of individual grant applications to the Foundation will be stored as described above.</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, 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 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>		<p>authorities to the extent that we are obligated to do so.</p>	
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#### 2.4 Administration of business relationships

Purpose	Categories of personal data and legal basis for the processing	Source from which data is collected	Recipients	Data storage
<p>Administration of business relationships (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 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</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> <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</li> </ul>	<p>Data will be stored for as long as we have a business relationship with you and for 5 years following the end of the year in which the agreement with the Foundation ends.</p>

	<p>obligations, e.g. in relation to consultancy agreements, cf. Article 6.1.b of the GDPR:</p> <ul style="list-style-type: none"> <li>CVs and other information about competences and relevant working experience</li> </ul>		<p>we collaborate to assist the Foundation; 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>	
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\* Secondary use of personal data

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
- Email
- Gender
- City and country of residence
- Birth year

We will share this personal data with other funders and RoRi through the funder platform, including Wellcome that is hosting the funder platform. 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.

### **3 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, China, Philippines, Ukraine and Canada.

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).

### **4 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.

### **5 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.

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

These rights may be subject to certain conditions or limitations. For example, you may not have the right to obtain data portability in certain situations; this will depend on the specific circumstances of the processing activity.

*Last updated 11 February 2021*