

# Novo Nordisk A/S' Annual General Meeting

## Processing of personal data

### 1. Purpose

In connection with Novo Nordisk A/S' Annual General Meeting, we collect, store and process personal data. Below you will find a description of the information which we may collect, store and process along with the purposes and legal basis for same.

Also, we refer to our privacy and cookie policy, which is available on the website of Novo Nordisk A/S: <https://www.novonordisk.com/data-privacy-and-user-rights.html>

### 2. Who are we?

The company responsible for processing your personal data is:

Novo Nordisk A/S

Novo Alle 1, DK-2800 Bagsværd, Denmark

Company number: 24256790

Email: [privacy@novonordisk.com](mailto:privacy@novonordisk.com)

Tel: +45 4444 8888

("Novo Nordisk" or the "Company")

You can always contact Novo Nordisk A/S or the Novo Nordisk Data Privacy Officer at [privacy@novonordisk.com](mailto:privacy@novonordisk.com) with questions or concerns about how we process your personal data.

Novo Nordisk A/S is data controller and is therefore responsible for your personal data as well as for ensuring legitimate and correct data processing.

### 3. Data, purposes and legal basis for processing

We collect, store and process personal data about shareholders and certain other persons registering for or participating at the General Meeting. This occurs in different respects, as follows:

#### a. The notice of the General Meeting

Novo Nordisk publishes and distributes notices of the General Meeting to the general public and to shareholders based on the name, address and e-mail address recorded in our register of shareholders with the purposes of convening the General Meeting and inviting shareholders to the General meeting in line with legal requirements and to enable shareholders to exercise their shareholder rights at the General Meeting.

The notice, including the agenda with complete proposals and certain auxiliary documents (such as but not limited to forms for granting proxy and voting by correspondence), is published as a company announcement through Nasdaq Copenhagen, on Novo

Nordisk's website, it is distributed by e-mail to shareholders having requested so and it will remain publicly available on our website for ten years. Additionally, Novo Nordisk may store until no longer necessary the notice, agenda and the auxiliary documents with the purpose of protecting and pursuing the interests of Novo Nordisk and its shareholders.

b. Registration of attendance and appointment of proxy

When shareholders register for attendance (whether that be in connection with virtual or personal attendance), with or without a companion/advisor, and when shareholders appoint a proxy, the Company will collect and process personal data about the shareholder, the companion/advisor and the proxy.

This includes the name, address and e-mail address of the shareholder and the companion/advisor, the name and address of the proxy and information about the shareholder's shares in the Company. Admission cards issued to shareholders and companions/advisors will include the name and address of the shareholder and companion/advisor, respectively. In connection with registration of attendance and actual attendance, Novo Nordisk will process personal data about (i) the shareholder on the basis of information registered in the register of shareholders and (ii) the companion/advisor on the basis of information in the general meeting registration system. Novo Nordisk collects and processes this personal data based on Novo Nordisk's legitimate interest in being able to control and verify that the relevant persons have access to participating and exercising their rights at the general meeting as well as keeping a record of attendees at the general meeting.

Information about registrations, actual attendance and proxies may be stored and accessed by the Company for as long as the purpose of protecting and pursuing the interests of the Company and its shareholders renders necessary.

c. Screening of individuals subject to EU, UK, or US sanctions

The Company is obligated to ensure that persons subject to economic sanctions by the European Union, the United Kingdom or the United States of America, do not exercise shareholders' rights during the General Meeting. To fulfil this legal obligation, the Company may process personal data about shareholders participating in the General Meeting against relevant sanctions lists. This includes the name and home address of the shareholder on the basis of information registered in the register of shareholders.

d. Questions submitted before the General Meeting

If shareholders, advisors or proxies submit questions to the board or management of the Company before the General Meeting, persons submitting the questions must present documentation for being a shareholder or advisor/proxy legitimately appointed by

a shareholder. In that connection and for the purpose of the Company's verification of such status, personal data of the shareholder and the advisor/proxy, as applicable, will be collected and processed in service of the Company's legitimate interest in identifying the shareholder, advisor/proxy and verifying and facilitating the right to ask questions. If a question is answered in writing, the question, the name of the shareholder/advisor/proxy having raised it and the Company's answer will be presented at the general meeting. Furthermore, the question and the Company's answer will be published on the Company's website, included in the minutes of the general meeting and will be disseminated through the webcast of the general meeting.

Information about questions submitted may be stored and accessed by the Company for as long as the purpose of protecting and pursuing the interests of the Company and its shareholders renders necessary.

e. Submission of proposals

If shareholders, advisors or proxies submit requests for inclusion of specific matters on the agenda for the general meeting, persons submitting the request must present documentation for being a shareholder or advisor/proxy legitimately appointed by a shareholder. In that connection and for the purpose of the Company's verification of such status, personal data of the shareholder and the advisor/proxy, as applicable, including name, address and shareholding will be collected and processed in service of the Company's legitimate interest in identifying the shareholder, advisor/proxy and verifying and facilitating the right to submit proposals for inclusion on the agenda. If the request meets the applicable criteria, the proposal and the name of the shareholder/advisor/proxy having submitted it will be included on the agenda, in the notice, in the form for proxy voting and voting by correspondence which is subsequently published as required by law and the Company's articles of association. Also, this information will be included in the minutes of and will be disseminated through the webcast of the general meeting.

f. Standing for election

Persons standing for election at the general meeting must present documentation for being eligible along with information about other managerial responsibilities. In that connection and for the purpose of establishing the candidate's identity and eligibility, personal data of the candidate including name and managerial positions held, will be collected and processed in service of the Company's legitimate interests in having access to the information necessary for subsequent registrations with authorities and in complying with mandatory requirements under Danish corporate law. If the candidate meets the applicable criteria, the name of the candidate and a record of other managerial responsibilities will be included on the agenda and in the notice, and the name will be included in the form for proxy voting and voting by correspondence all of which is subsequently published as required by law and the Company's articles of association.

Also, this information will be included in the minutes of and will be disseminated through the webcast of the general meeting.

g. Right to raise questions and make statements at general meetings

Persons raising questions, presenting an opinion, or who otherwise make statements at the general meeting, whether verbally or in writing and whether at the venue or through the IT application Computershare Meeting Services, will be asked to document their status as a shareholder, advisor or proxy. In that connection and for the purpose of the Company's verification of such status, personal data including name, address and shareholding of the shareholder and the advisor/proxy, as applicable, will be collected and processed in service of the Company's legitimate interest in identifying the shareholder, advisor/proxy and verifying and facilitating the right to raise questions and make statements at the general meeting. Also, this information as well as the question raised/statement made will be included in the minutes of and will be disseminated through the webcast of the general meeting.

h. Voting

Shareholders submitting votes at the general meeting, whether that be by proxy (with or without instructions), by correspondence votes or by voting through the IT application (Computershare Meeting Services) applied for real time voting during the course of the general meeting, will be required to submit personal information such as name, address, VP account number, registration/participation codes along with indication of their opinion (for/against/abstain) on matters put up for voting. In that connection the Company will collect and process such personal data in service of the Company's legitimate interest in verifying the validity and admissibility of the votes, to secure the full and correct counting of votes, document same and to support the issuance of confirmations that votes submitted have been counted and included in the results. These activities are compulsory under Danish corporate law and processing of personal data therefore occurs to comply with statutory requirements.

Information about voting may be stored and accessed by the Company for as long as the purpose of protecting and pursuing the interests of the Company and its shareholders renders necessary.

i. Webcast and Video

The Company will webcast the general meeting, live, on its website and through the IT application Computershare Meeting Services and a recording will remain publicly available on demand for a period of up to 18 months after the general meeting. Also, video/live motion picture recording will take place at the venue of the general meeting and such recording will be displayed on screens at the venue of the general meeting. The recordings will include sound and images from the physical venue of the general

meeting, it will show the agenda (including proposals from shareholders), the image of shareholders/advisors/proxies attending the general meeting and who choose to speak and it may show questions or statements submitted in writing during the general meeting including the identity of the person having submitted same. Accordingly, personal data of shareholders/advisors/proxies will be collected and processed by the Company and opting out of such collection and processing is not possible for persons attending at the venue and for persons choosing to speak or submit statements in writing. The collection and processing serves the Company's legitimate interest in documenting and transmitting the proceedings at the general meeting and making it available to shareholders and media who are unable to attend or view the live webcast of the general meeting.

j. Minutes

The Company will document the agenda, proposals, deliberations and decisions at the general meeting in written minutes. Accordingly, proposals, statements, questions whether verbal or written, including the identity of the shareholder having submitted same at or for the general meeting are recorded in the minutes. Minutes are compulsory under Danish corporate law and processing of the personal data as set out under items c, d, e, and f therefore occurs to comply with statutory requirements. Refusal of mentioning in the minutes of the identity of individuals having submitted proposals, or of the proposal itself, included in the agenda is not possible. The minutes will be available on the Company's website and will remain generally available to shareholders and the public for ten years after the general meeting.

The minutes may be stored and accessed by the Company for as long as the purpose of protecting and pursuing the interests of the Company and its shareholders renders necessary, implying that the minutes will never be deleted.

**4. Data subjects' rights**

According to the data protection rules you have the right to insight, to object to processing, to have your data corrected and deleted and to restrict processing of your personal data. For more information about how Novo Nordisk will process your personal data and to exercise your rights, please contact [privacy@novonordisk.com](mailto:privacy@novonordisk.com)

If you wish to complain about Novo Nordisk's processing of your personal data, you can contact the Danish Data Protection Agency.

**5. Transfer of personal data to recipients outside the EU/EEA**

For the purpose listed above in d, e, f, h and i, personal data may be transferred to recipients outside the EU/EEA, e.g. by live broadcast, where information is made available

to other shareholders or where information is publicly available due to national legislative requirements. Such transfer will be based on the derogations provided for by Article 49 of the GDPR, namely that the transfer is necessary for the performance of a contract between the data subject and the controller, cf. Article 49(1)(b) and that such transfer may be necessary for conclusion or performance of a contract concluded in the interest of the data subject, cf. Article 49(1)(c).