

Last updated: 17 December 2020

This Lundbeck privacy notification explains when and how H. Lundbeck A/S (“Lundbeck”), as data controller in certain situations, collects and processes:

- Personal data collected or obtained via Lundbeck.com
- Personal data regarding next of kin to Lundbeck employees obtained or collected via H. Lundbeck employees
- Personal data obtained from third parties for scientific research
- Personal data obtained through video surveillance at the Lundbeck property in Valby and/or Lumsås
- Personal data collected in relation to site access/guest registration at the Lundbeck property in Valby and/or Lumsås
- Personal data collected in relation to work related accidents at the Lundbeck property in Valby and/or Lumsås
- Personal data obtained in relation to investors’ acquisition of Lundbeck shares
- Personal data obtained in limited situations when Lundbeck audio/video records a meeting
- Personal data obtained from third parties as part syndicated data files in market research.

Type of processing and categories of individuals	Categories of personal data and source if relevant	Purpose of processing	Legal basis	Disclosure of personal data, if relevant and legal basis for the disclosure
Personal data collected or obtained via Lundbeck.com				
Via Lundbeck.com - Subscribers to investor notifications	<ul style="list-style-type: none"> • Email address • Alert type (your preferences) • Language preferences • Whether consent for direct marketing and processing of personal data has been given 	<ul style="list-style-type: none"> • Providing the requested email notification/alert • Direct marketing 	The legal basis is consent, cf. Article 6(1)(a) of the GDPR or Lundbeck’s legitimate interest in providing you with the requested email notifications, cf. Article 6(1)(f) of the GDPR.	
Via Lundbeck.com - users of “contact us” form (PV)	<p><u>If users of Lundbeck.com use our “contact form” for reporting on side effects and adverse events regarding our medicinal products (as patients), we will obtain the following data from the patient:</u></p> <ul style="list-style-type: none"> • Contact information (name/initials, address, email address) 	<ul style="list-style-type: none"> • It is a legal requirement that H. Lundbeck A/S collects and processes your personal data. We are obliged to register, monitor and analyse the adverse events that are reported to 	<p>The legal basis for Lundbeck’s collection and processing of your personal data is:</p> <ul style="list-style-type: none"> • a legal obligation in section 53 of the Danish 	To continuously ensure the safety of our products we may disclose your personal data to relevant local health authorities, business partners and the Lundbeck Group companies.

<ul style="list-style-type: none"> • Country • Information on date of birth, age/age group, gender • Information on health and medication • Sex life/sexual orientation (only if reported and relevant*) <i>*In general, this category of data is not specifically requested and collected but only captured and processed if reported in connection with an adverse event report and relevant for the medical and scientific assessment and evaluation of the case</i> • Criminal convictions/offences (only if reported and relevant*) <i>*In general, this category of data is not specifically requested and collected but only captured and processed as part of an adverse event report related to a legal case or an insurance case or where the data relevant for the medical and scientific assessment and evaluation of the case</i> • Other personal data contained in the message or in the attached document <p><u>Healthcare professional and individuals reporting on behalf of patients:</u></p> <ul style="list-style-type: none"> • Contact information (name/initials, address, email address) • Country • HCP profession/title (only HCPs) • Other personal data contained in the message or in the attached document <p>The source of data obtained in the “contact us” form (PV) is relative/individual or healthcare professionals reporting on behalf of you and publicly available sources such as websites or social media (in general, these sources are not monitored. Due to relevant regulation, Lundbeck employees that incidentally identify adverse</p>	<p>Lundbeck and to perform medical and scientific evaluation of any adverse event that may be related to a Lundbeck product. This is done to ensure high standards of quality, to enhance patient care and patient safety and to assess the risk-benefit profile of medicines</p>	<p>Medicines Act and section 5 of the Danish executive order on the monitoring of adverse reactions from medicinal products which implements parts of Chapter 1 and 3 of Title IX of Directive 2001/83/EC of the European Parliament and of the Council of 06 Nov. 2001, as amended by Directive 2010/84/EU of the European Parliament and of the Council of 15 Dec. 2010 cf. Article 6 (1) (c) of the GDPR;</p> <ul style="list-style-type: none"> • to ensure high standards of quality and safety of health care and of medicinal products cf. Article 9(2)(i) of the GDPR; and • criminal convictions: section 8(3) of the Danish Data Protection Act cf. Article 10 of the GDPR. It is Lundbeck’s assessment that the processing of criminal convictions is (when relevant) necessary for the medical and scientific assessment and to ensure high standards of quality and safety of health care and of medicinal products 	<p>The legal basis for the disclosure is:</p> <ul style="list-style-type: none"> • a legal obligation in section 53 of the Danish Medicines Act and section 6 and 7 of the Danish executive order on the monitoring of adverse reactions from medicinal products which implements parts of Chapter 3 of Title IX of Directive 2001/83/EC of the European Parliament and of the Council of 06 Nov. 2001, as amended by Directive 2010/84/EU of the European Parliament and of the Council of 15 Dec. 2010 cf. Article 6 (1) (c) of the GDPR and • to ensure high standards of quality and safety of health care and of medicinal products cf. Article 9(2)(i) of the GDPR. • criminal convictions: section 8(4) of the Danish Data Protection Act cf. Article 10 of the GDPR. It is Lundbeck’s assessment that the disclosure of criminal convictions is necessary for the medical and scientific assessment and to ensure high standards of quality and safety of health care and of medicinal products
--	---	--	--

	events in publicly available sources (e.g. social media) are however obliged to report those to Lundbeck.			
Via Lundbeck.com - Users of "contact us" form (other inquiries than PV)	<ul style="list-style-type: none"> Name, telephone number, email address Name of organization Country Other personal data contained in the message or in the attached document Type of requested service, if any 	<ul style="list-style-type: none"> Providing the requested service Handling of inquiries 	The legal basis is Lundbeck's legitimate interest in providing the requested service and handling inquiries, including examinations in this regard, cf. Article 6(1)(f) of the GDPR.	We may disclose your personal data to <ul style="list-style-type: none"> our affiliates within the Lundbeck Group other recipients depending on your inquiry in order to handle your request. <p>Depending on your inquiry, the legal basis for the disclosure is contract (Article 6(1)(b) of the GDPR), consent (Articles 6(1)(a) and 9(2)(a) of the GDPR), compliance with a legal obligation (Article 6(1)(c)) and/or Lundbeck's legitimate interest in providing the requested service and handling your inquiry, cf. Article 6(1)(f) of the GDPR.</p>
Via Lundbeck.com - Users who order Lundbeck Magazine or other Lundbeck information (e.g. information on our Graduate Program)	<ul style="list-style-type: none"> Name, email address, telephone number, address Title Company Profile (e.g. student, employee etc.) Type of requested service from Lundbeck (Lundbeck Magazine or other Lundbeck information) Whether consent for direct marketing and/or processing of personal data has been given 	<ul style="list-style-type: none"> Providing copies of Lundbeck Magazine or other Lundbeck information, as requested Direct marketing 	The legal basis is consent, cf. Article 6(1)(a) of the GDPR or Lundbeck's legitimate interest in providing you with Lundbeck Magazine as requested, cf. Article 6(1)(f) of the GDPR.	
Via Lundbeck.com	By use of cookies, we may collect information on how you use lundbeck.com and your online	We use necessary cookies, functional cookies, statistical	The legal basis is consent, cf. article 6 (1) (a), cf. also	Data collected via cookies may be shared with our third party cookie

<p>- All users of the website (via cookies)</p>	<p>behaviour. The type of personal data collected are:</p> <ul style="list-style-type: none"> • IP address, including your network location • Information about your computer • Type of browser • Search words 	<p>and marketing cookies. Please see a full description of these cookies in our Cookie Policy.</p>	<p>the Danish Executive Order on Cookies.</p> <p>For necessary cookies, the legal basis is Article 6(1)(f) of the GDPR.</p> <p>Lundbeck has a legitimate interest in providing the website and functionalities to users.</p>	<p>providers, including via plug-ins. In certain cases, Lundbeck will be considered joint controller with some of these third parties. You can read more and find a link to the privacy notification of these third parties in our Cookie Policy.</p>
<p>Personal data collected or obtained via other channels/devices/third parties (not via Lundbeck.com)</p>				
<p>Employee emergency contact - Next of kin to employees at H. Lundbeck A/S</p>	<ul style="list-style-type: none"> • Name and contact information <p>The source of data regarding you as next of kin to a Lundbeck employee is the employee.</p>	<ul style="list-style-type: none"> • Being able to contact an employee's next of kin in case of an emergency. 	<p>The legal basis is Lundbeck's legitimate interest in being able to contact the next of kin in case of an emergency, cf. Article 6(1)(f) of the GDPR.</p>	
<p>Scientific research data - (including RWD data)</p>	<ul style="list-style-type: none"> • Health information • Biological material / human samples <p>The source of data regarding scientific research is various research data bases, including public databases and biobanks.</p> <p>The personal data will be pseudonymised and the data will not be directly identifiable to Lundbeck.</p>	<ul style="list-style-type: none"> • As a pharmaceutical company, Lundbeck processes personal data for scientific research purposes within a range of areas. Read more about Lundbeck's activities within research and development here. 	<p>The legal basis is Article 9 (2)(j) of the GDPR cf. the Danish Act on Processing of Personal Data Section 10.</p>	<p>The data may be transferred, including to universities or authorities, subject to the provisions set out in Section 10 of the the Danish Act on Processing of Personal Data.</p> <p>In specific cases, other appropriate legal basis may be relied upon.</p>
<p>Video surveillance – visitors at the Lundbeck property in</p>	<ul style="list-style-type: none"> • Personal data recorded by thermal camera on Lundbeck's property 	<ul style="list-style-type: none"> • Improving the safety and thereby increasing the level of security on the site in Valby and/or Lumsås. 	<p>The legal basis is Lundbeck's legitimate interest in trying to prevent,</p>	<p>The data obtained via video surveillance may be shared with the police in case of suspicion of an illegal act. The legal basis is § 8(4)</p>

Valby and/or Lumsås	The source of data collected through video is the camera capturing your whereabouts and actions on Lundbeck's property in Valby and/or Lumsås.		detect and solve crime, cf. Article 6(1)(f) of the GDPR. If criminal data is processed the legal basis is § 8 of the Danish Data Protection Act, cf. Article 10 of the GDPR.	of the Danish Data Protection Act, cf. Article 10 of the GDPR.
Site access / Guest registration – Externals visiting Lundbeck's premises in Valby and/or Lumsås	<ul style="list-style-type: none"> Name, telephone number, email address Photo (if applicable) <p>The source of data in relation to site access/guest registration (when not collected directly from you) is either a Lundbeck employee or your employer.</p>	<ul style="list-style-type: none"> Being able to provide access to you as a visitor or an external working at the site for a limited period of time. 	The legal basis is Lundbeck's legitimate interest in knowing who is always present on the site, cf. Article 6(1)(f) of the GDPR.	
Work related accidents – Externals working at the Lundbeck property in Valby and/or Lumsås	<ul style="list-style-type: none"> Personal data that are a part of the information we collect on how the accident happened. <p>The source of data in relation to work related accidents may also be (when not collected directly from you) a Lundbeck employee or another witness.</p>	<ul style="list-style-type: none"> To increase safety and to be able to implement corrective and preventive actions. 	The legal basis is Lundbeck's legitimate interests in improving site security and preventing future accidents, cf. Article 6(1)(f) of the GDPR.	
Investors – Investors' acquisition of shares in H. Lundbeck A/S	<ul style="list-style-type: none"> Name, Address, Number of shares, Number of votes Investor type <p>The source of data in relation to investors (when not collected directly from you) is VP Securities A/S.</p>	<ul style="list-style-type: none"> Keeping a register of Lundbeck's investors Inviting to general assembly Analysing composition of investors Being able to communicate with investors 	The legal basis is Lundbeck's legal obligation the Danish Companies Act, cf. article 6(1)(c) of the GDPR, and Lundbeck's legitimate interests in (i) analysing the composition of Lundbeck's shareholders, (ii) being able to communicate with shareholders (e.g. in relation to sending out invitation for	Personal data are disclosed to the VP SECURITIES A/S for the purpose of investor administration. The legal basis is section 61 of the Danish Companies Act, cf. article 6(1)(c).

			general assembly) and (iii) paying dividends to shareholders, cf. article 6(1)(f) of the GDPR.	
Meeting participants – recording of meetings	<p>In limited situations, Lundbeck may (audio/video) record meeting/presentations/webinars (“Meetings”) if it is assessed that there is a specific need and relevant business purpose for this. The Lundbeck meeting host will always specifically inform you if video recording takes place at the Meeting you will attend.</p> <p>In case the Meeting you participate in is recorded, we will process</p> <ul style="list-style-type: none"> • your digital image (if you have your video camera turned on), • audio recordings of your input/question at the meeting (if you speak), and • written input/questions you provide via the chat-functions (e.g. for webinars or similar). 	<ul style="list-style-type: none"> • Relevant business purposes such as for example; to ensure that the meeting can be translated in case of non-English speaking Lundbeck employees or to ensure that the video will be made available to invited participants if they are absent at the meeting. 	<p>The legal basis for recording is Lundbeck’s legitimate interests in pursuing a relevant business purpose (as described to the left), cf. Article 6(1)(f) of the GDPR. In light of the business purpose of the meetings, the interests of the participants are generally assessed not to override Lundbeck’s interests.</p>	<p>For smaller meetings, the recording may be shared with meeting participants or invited participants that were absent at the meeting. The legal basis is Lundbeck’s legitimate interests in pursuing a relevant business purpose (as described to the left), cf. Article 6(1)(f) of the GDPR.</p> <p>Other types of transfer or uses (e.g. for larger meetings; upload to the Lundbeck intranet) will be assessed on a case by case basis.</p>
Market Research – health care professionals participating in questionnaires from third party Market Research Partners	<p>Lundbeck may collect the following on health care professionals participating in Market Research</p> <ul style="list-style-type: none"> - Contact details and - Answers to market research questions - <p>The answers are collected from a third party market research partner, and compiled into a syndicated data file, where the personal details of the individuals are not included. However, as the relevant market research partner holds the key to the anonymized data files the data contained in the files are still regarded as personal data under the GDPR. Lundbeck will never get access to the key and will therefore never be able to link the answers listed in the data files to specific persons.</p>	<ul style="list-style-type: none"> • Performing market research 	<p>The legal basis is Lundbeck’s legitimate interest in during market research in order to ensure the business of Lundbeck confirms with the market demand, cf. Article 6(1)(f) of the GDPR.</p>	

When we collect personal data directly from you, e.g. via contact forms or when you sign up for Lundbeck Magazine or Investor notifications, you provide the personal data voluntarily. You are not obligated to provide the information to us. The consequences of not providing the personal data are that we cannot provide the service or assist you in relation to the inquiry you request.

Use of data processors

Lundbeck uses data processors (e.g. hosting companies, IT providers, including for cookie purposes, consultants, business partners and members of our Lundbeck Group), and your personal data may therefore be transferred to, processed and stored by these third parties engaged by Lundbeck, who will process your data on Lundbeck's behalf and assist in the provision of the content and services you use or request. These third-party providers will be obligated by Lundbeck to safeguard the confidentiality of your data and to take adequate technical and organizational measures to protect your data against accidental or unlawful destruction, loss or alteration, unauthorized disclosure or abuse, or other unlawful processing.

Transfer of data to countries outside the EU/EEA

We may transfer personal data to other countries, some of which have not yet been determined by the European Commission to have an adequate level of data protection. Lundbeck will ensure that such transfer(s) will be carried out in accordance with the applicable data protection legislation, including the GDPR.

Transfers to countries outside the EU/EEA may take place if the recipient enters into the [EU Standard Contractual Clauses](#). The transfer can also be made if the recipient is located in a country providing an adequate level of data protection (see the [full list of these 'secure countries' on the EU Commissions' website](#)). If your personal data is transferred to other Lundbeck affiliates, the transfer will be based on the Lundbeck Intra Group Agreements (or the Binding Corporate Rules, once implemented). More information can be obtained by contacting Lundbeck's on dataprivacy@lundbeck.com.

For PV data which Lundbeck transfers to health authorities in countries outside the EU/EEA, the legal transfer basis is Article 49(1)(d) of the GDPR (transfer is necessary for important reasons of public interest).

Retention periods

Data related to subscribers to investor notifications: Personal data related to your subscription to notifications for investors will be deleted immediately after you have unsubscribed from our service, unless storage for a longer period is required under applicable law.

Data obtained in the "contact us" form (PV): According to relevant pharmacovigilance legislation we are obliged to store your personal data for the lifetime of the product plus additional 10 years, as a minimum. However, the retention period of the personal data may be longer where union law or national law so requires.

Data obtained in the "contact us" form (other inquiries than PV): Personal data related to your requests and inquiries will be deleted immediately after replying to you unless storage for a longer period is required under applicable law. Data related to orders of Lundbeck Magazine: Personal data related to your order of the Lundbeck magazine will be deleted at the latest 1 month after we have sent you the requested Lundbeck Magazine. For data related to your order of other Lundbeck information (e.g. on Graduate Program), the data will be deleted after 6 months.

Data obtained via cookies: Cookies and the connected collection of personal data will be deleted as described in the [Cookie Policy](#) unless storage for a longer period is required under applicable law.

Data on next of kin to employees at Lundbeck: Personal data related to next of kin will be deleted once the relevant Lundbeck employee no longer works at Lundbeck.

Data related to scientific research: Personal data related to scientific research will be deleted according to retention periods set in the contracts which the source of the data, however, will be deleted at the latest 5 years after it has been received.

Data collected through video surveillance: Recordings will be deleted after 30 days unless storage for a longer period is required under the Danish TV Monitoring Act.

Data collected in relation to site access/guest registration: Personal data are stored for as long as necessary to fulfil the purpose described above, however, for site access data no longer than 36 months, and for guest registration data no more than 12 months.

Data collected in relation to work related accidents: We store your personal data for as long as necessary to fulfil the purposes described above, however for no longer than 12 months.

Data collected in relation to investors acquisition of shares: We store your personal data for as long as necessary to fulfil the purposes described above, however for no longer than 18 months.

Data collected in relation to recording of meetings: We store your personal data for a maximum of 30 days, unless you have been informed otherwise.

Data collected in Market Research: If the market research study is product related, we keep and use the market research reports for a period corresponding with the patent protection on the product + and additional 5 years. If the market research study is not product related, both more general within a disease area or a specified market, we keep and use the market research reports for no longer than 10 years after the completion of the market research study.