



K.W. BRUUN

DATA ETHICS POLICY

At K.W. Bruun, we are aware of the increased data ethics responsibility that comes with rapid technological developments, and we are addressing the need for an ethical data use and development framework that goes beyond the statutory requirements for data processing stipulated in the EU General Data Protection Regulation and the national Data Protection Act.

Ethical values in data processing

Integrity and responsibility are part of our DNA, and therefore, we have a duty to protect the right to privacy and to ensure protection of registered data. At K.W. Bruun, we process several types of data. This includes data that is confidential due to business concerns, and ordinary as well as sensitive personal data.

Using data encryption, for example, all personal data is kept secure to adequately prevent unauthorised persons from accessing such data in the event of theft. From a data-ethics perspective, our handling of data focuses on the values of trust, data quality and transparency.

Trust

In line with developments, we have constant focus on optimising our digital business models, targeting internal as well as external stakeholders. Thus, we attach significant value to personal data, as this enables us to deliver a professional and targeted customer experience and

service. Therefore, trust is key to us. Trust enhances our efficiency and our ability to integrate data and make decisions based on considerations for the people behind our data. This will add more value for all parties involved.

Data quality

We receive and collect data for a number of different purposes. It ranges from customer inquiries with contact details to registration of customer data when customers purchase regularly invoiced service agreements. Furthermore persons who wish to receive various news and offers. In each of these areas, an assessment is made of how data is collected, registered, stored, disclosed, if relevant, and erased. When launching new activities or developing new digital solutions, we work on the basis of a privacy-by-design approach. This involves considerations about which personal data will be included, the processing of such data, and who will have access to the data. There is focus on ensuring that only the data required for the specific purpose will be collected.

In relation to our employees, we only process the data submitted in connection with the employment. We minimise the scope of data by only processing personal data that is necessary and adequate to fulfill the relevant purposes. Employee data is only available to relevant persons in connection with fulfilling the purpose.

Transparency

We focus on transparent data handling where customers and employees are aware of their rights, including the right of access, the right to rectification, the right to erasure, the right to data minimisation, the right to object, right to withdraw consent and the right to data portability.



Responsibility and follow-up

The executive boards of the companies are responsible for implementing the group's data ethics policy in all companies at all organisational levels. Responsibility for integrating the data ethics policy into day-to-day operations is at management level. All employees of the group must respect the right to privacy and contribute to responsible and ethical data behaviour. Everyone has a duty to ensure compliance with K.W. Bruun's employee guidelines on processing personal data (policy on personal data). The policy is available on the group intranet, ShareMore.

If you know about or suspect a breach of data protection legislation, you should report this to the company's GDPR & Compliance Manager, or submit a report through the WhistleBlowerLine, which allows you to report such matters anonymously. All reports will be treated confidentially and seriously.

The K.W. Bruun group regularly, and at least once a year, assesses whether the policy needs to be updated.