

## Data ethics

Data plays an increasingly important role for ESVAGT in monitoring, delivering and improving our services for customers, employees and other stakeholders. As data is an important asset, we treat it as such.

Data is handled in compliance with all applicable laws and regulations and in accordance with ESVAGT's internal standards and policies. We continuously monitor and ensure that data is handled in a transparent manner with due respect for our customers, business partners, and employees.

In addition to our dedicated GDPR data protection compliance program and our internal Information Security Handbook, ESVAGT has defined overall principles for our data ethics policy that determine how we handle our data, including collecting, using, accessing and sharing data.

The principles are:

- **Transparency**

ESVAGT strives to uphold transparency in our use of data, to ensure our customers, partners and employees know what data is collected, shared and how it is used. We only collect data necessary for the purpose, and we monitor and adjust internal processes to keep and improve the transparency hereof.

- **Responsibility**

ESVAGT recognises that data and systems can be used – and misused – for purposes other than were intended. We therefore integrate internal controls and train employees to apply high ethical standards when handling data and using our systems.

- **Security**

ESVAGT will always handle data in compliance with applicable laws and practices, and protect data for our customers, business partners and employees. All employees are informed and know about our Information Security Handbook, which include rules about IT security and data handling. We always ensure that our IT systems operate securely utilising trusted and the newest software and hardware available.

- **Digitalisation**

ESVAGT believes that digitalisation will create value to our business in multiple ways. Usage of big data and digitalised working processes will optimise our efficiency, productivity, and accuracy on many levels. Therefore, we always seek to find alternative and improved digitalised IT and data solutions for our daily administration and operations and towards our customers to support their business optimisation.

ESVAGT's management and IT department will continue to work with the data ethics policy and comply with existing and new rules and policies within the area. In addition, data ethics will be added to ESVAGT's Governance & Compliance Awareness Training course for all employees.

*Policy on Data Ethics - Version 2021.*

The policy on Data Ethics is reviewed externally and compliant with section 99d of the Danish Financial Statements Act.