

NETCOMPANY GROUP A/S – CVR NO.: 39 48 89 14

DATA ETHICS POLICY

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netcompany

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1 Introduction

We live in an age, where the digital world is evolving with unparalleled haste, continuously revealing new and innovative ways of improving our lives. With all the great possibilities following the digital transformation, however, also follows big responsibilities. The right to privacy is a fundamental human right, which must be protected and respected no matter what, along with the other fundamental human rights, as they all together correlate the foundation of modern society.

With our Data Ethics Policy, we wish to commit ourselves to a higher standard on how we process data, which is not only legally compliant, but also abides to our ethical values and morals. It is our sincere hope that with this Data Ethics Policy we may articulate our values and morals making them more visible to our customers, employees, and business partners, subsequently facilitating an even greater integration between our IT solutions and services and the right to privacy.

2 Purpose

The purpose of this policy is to formally state Netcompany's data ethics principles and describe the overall ways on how we process personal data, making it clear to our customers, employees, and other stakeholders that we are dedicated in protecting their data to the highest ethical standards.

3 Our Data Ethics Principles

In Netcompany, we process large amounts of data on behalf of our customers and within our own organisation. Data and information security have always been a fundamental part of Netcompany's business, as it is of great importance to us that our customers and employees may always feel safe when entrusting us with their data.

Netcompany's Data Ethics Principles are embodied in three key principles: security, integrity, and trust.

Security

As an IT service company information security is an integral part of who we are and an integral part of our solutions. It is the foundation of our Netcompany Methodology and the way we think from the beginning of a project to the development and maintenance of the solutions and services we offer. We follow the international information security standard of ISO/IEC 27001 just as some of our entities have been officially certified under the scheme. Security is and always has been a top priority to Netcompany and will perpetually continue to be so in the future.

Integrity

To Netcompany, integrity is about doing what is right, even when no one is looking. It is about safeguarding the people that our solutions and internal processes affect at the highest priority and without any exemptions. Economical profit or any other material benefit may never override the fundamental rights and safety of an individual. In Netcompany, this codex is paramount in our everyday work as a company and in our work with data protection and privacy.

Trust

Trust is an essential part of any relationship, and the trust of our customers, employees, shareholders, and other stakeholders is the truest testament to our success as a company. Trust is earned over time and it is built with consistency between what is said and what is done. It is our greatest hope and accomplishment to earn and uphold the trust of the people whose personal data we process whether this is done in our role as data controller or data processor.

4 Data processing in Netcompany

In Netcompany we process personal data as both data controller and data processor. In our role as data controller we mainly process personal data about job applicants and our employees provided by the job applicants and our employees themselves. In our role as data processor we process personal data about data subjects provided by our customers e.g. in connection to the maintenance or hosting of our customer's systems. The type of data we process range from regular personal data, such as names, addresses and phone numbers to sensitive personal data such as health information or union membership. It is always part of our data ethical considerations, what type of data we are processing, as the security measures must correspond to the sensitivity of

the data being processed. Such considerations are also part of our customer dialogue when advising about the software development of their IT solutions, so that privacy-by-design is contemplated from the beginning.

The international standard on information security ISO/ICE 27001 is a fundamental part of Netcompany's work, and internal audit controls are implemented to secure compliance with both information security and data protection requirements. Further to this, all our employees are continuously and thoroughly trained in the Netcompany Methodology, which embodies data protection security through a complete set of guidelines, tools, and templates for planning, delivering, managing, and documenting complex integrated IT solutions.

All data is securely stored at two different data centres, thus always ensuring data availability in the unlikely event that one of the data centres should be exposed to technical failures.

Netcompany does not sell any data to any third parties or profit from it in any other way. Neither do we currently use programs of artificial intelligence ("AI"), machine learning or similar in our own processes nor as part of our services.

Our Data Ethics initiatives and reporting is organisationally anchored with our CISO and our Legal Department. Further to this end, a Data Ethics and GDPR steering group (reporting to the Executive Management) has been established to facilitate and ensure Netcompany's continued efforts within data ethics and data protection.

5 Reporting

With the publication of Netcompany's ESG report for the financial year 2020, Netcompany will going forward annually report on the company's Data Ethics Policy in the ESG report.

Approved and adopted by the Board of Directors of Netcompany Group A/S on 11 December 2020.