Data Ethics 2022

Policy for Data Ethics for Container Centralen A/S

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Document History:

Version	Date	Comments
Draft	January 2022	Initial Draft
Approved	September 2022	Board Approval

Internal note: This policy is supported by internal policies,

- Deletion Policy – Employees
- Deletion Policy – Customers
- Deletion Policy – Vendors
- Data Sharing Policy

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1. Introduction

In this policy, we define Container Centralen A/S approach to data ethics pursuant to section 99 d of the Danish Financial Statements Act.

Data ethics concerns the ethical considerations which we as a company must consider when we use data and new technologies globally in Container Centralen A/S.

Data ethics goes beyond compliance governed by data privacy laws. We comply with all legal requirements but acknowledge and respect that our use of data (both personal data and non-personal data) may create risks for the users that applicable laws do not cover. We manage these risks by adhering to the principles described below.

2. Sources of data

In Container Centralen, we process various types of data, including:

- Personal data about job applicants, employees, users of our digital services, and business relations
- Non-personal data about our operating assets and other operations

We strive for high data ethics standards for the use of both personal and non-personal data.

3. Use of technologies
We use a variety of technologies when processing data.

4. Data ethics principles
We commit to the following data ethics principles:

4.1 Transparency and openness
We uphold transparency and openness concerning our use of data. We ensure that our data ethics principles remain clear, understandable, and easily accessible.

4.2 Use of data
Data is an important asset of our business. We have high standards in relation to where we collect data and how we use the data:

- We set high standards on ourselves in collecting data from our assets and other sources.
- We set high demands on our partners from whom we receive data. We encourage partners to work towards determining a set of data ethical principles for their own company.
- We refrain from extensive collection of data which may be characterised as data-driven surveillance.

4.3 Accountability
All data collection involves human decisions. Therefore, we strive to implement mechanisms to control the context in which data is collected, the systems that are used for data processing, and the methods for ensuring data quality.

We acknowledge that data and systems can be misused or used for unintended purposes. We assess and document permissible uses of our data and systems and take measures to avoid impermissible uses.

4.4 Processes and policies
We will develop additional policies and procedures to ensure that we comply with the above-mentioned principles.

4.5 Governance and reporting
Each year we will account for this policy in accordance with section 99 d of the Danish Financial Statements Act.

4.6 Approval
This policy was approved by the Board of Container Centralen Board A/S on September 15th, 2022.