

# Data Ethics Policy



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Policy owner: Rune Toft, Group CDO

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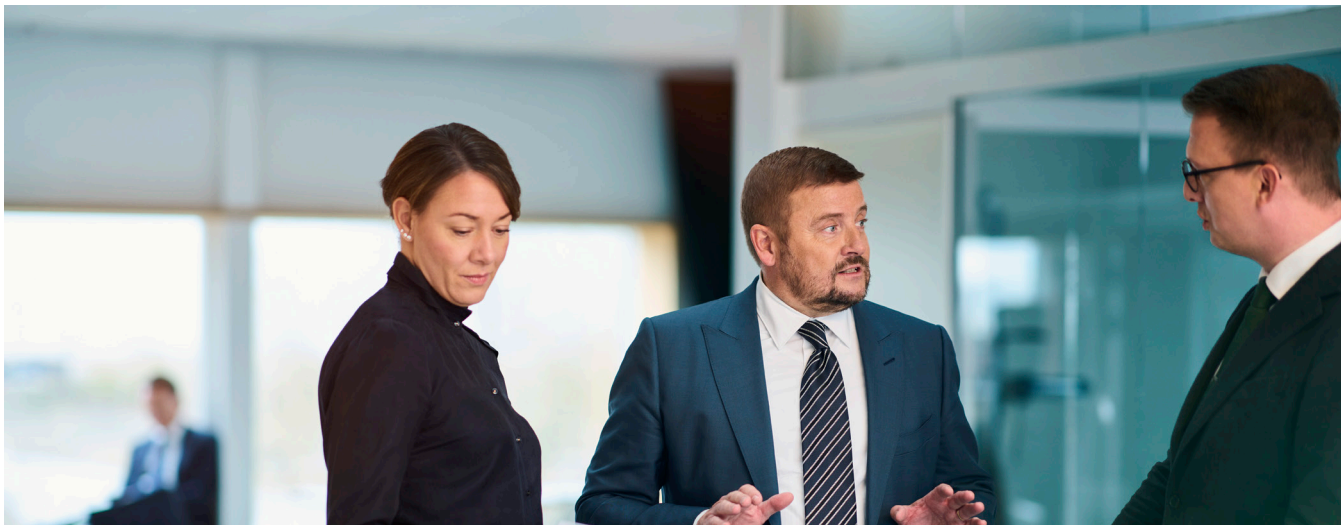
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Policy review: Bi-annually

For the purposes of this policy, 'Egiss' and 'Egiss Group' refers to Egiss A/S and its global affiliates.



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# Introduction

Egiss handles all kinds of business data and personal data, and we do that with profound respect for our customers, business partners, users and employees.

We acknowledge our obligation to think and act carefully every time we receive, collect, handle and store data to make sure that data is used for a right and lawful purpose with respect for the individual, and we work

actively to address data ethics issues in our business processes.

This policy sets the framework for Egiss' management of data from an ethical perspective describing our ethics principles and the overall ways on how we administrate data.



# Policy

In Egiss we want to be a trusted data partner, and we pursue that objective of being an honest, reliable and accountable full circle IT-hardware and logistics company.

We handle data with care for data security and privacy but also by complying to the Egiss values of being customer centric, innovative, collaborative and accountable with a smile.

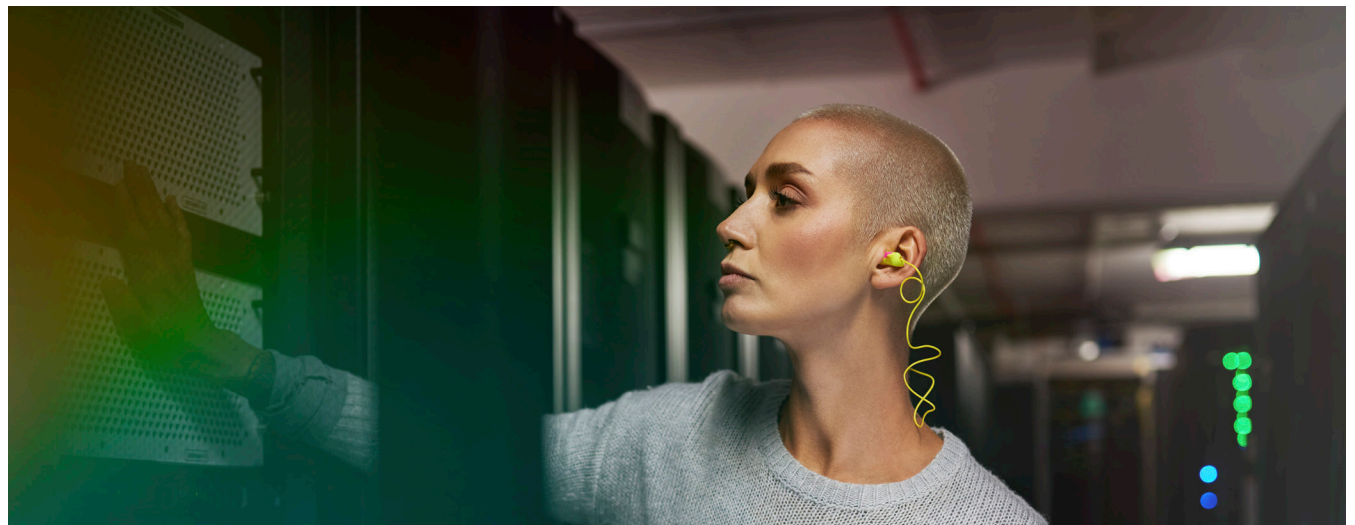
We expect our business partners to do the same.

## **We deliver reliability, efficiency and security**

Egiss provides companies the highest degree of reliability when providing their employees and offices around the world with IT hardware and tech devices.

We ensure that Price, Quality and Delivery are as expected in every Service and Solution provided by Egiss.

In a similar way Egiss handles the data needed to provide the services securely and efficiently with respect for privacy and in a way that customers, partners and employees can trust.



# Principles

## Data trading

We do not sell or share data with 3rd parties unless we have a specific agreement with the data owner to do so. Egiss may share generic and necessary data with suppliers and/or service providers in connection with the general operation of our business.

Egiss may also disclose data to a public authority in situations where we are specifically bound to disclose the data in accordance with the laws and notification obligations to which we are subject.

We receive technical data from third parties. We have policies in place to safeguard both business data and personal data and prevent the disclosure of information that can be attributed to the individual persons.

## Transparency

We ensure that our customers, users, business partners and employees know what kind of data we collect, how we store them and how we use the data in e.g. recruitment. We comply with the rights of the individual data owner, granted under the General Data Protection Regulation (EU GDPR). The specifics on how we handle data can be read in our Data Privacy Policy.

## Data processing in Egiss

Egiss handles some data as data controller. As data controller we mainly process personal data regarding our employees and job-applicants.

Rarely Egiss operates as data processor of sensitive personal identifiable information. In these exceptions Egiss agrees with the data owners to ensure the needed confidentiality.

We only store data in order to deliver our services to our customers and we always consider the type of data we need to handle, and for how long we need to store the data.

# Principles



## Training and awareness

Egiss' employees must always be aware about data ethics, data security and proper handling of personal data. Egiss has integrated this policy in our awareness- and training program concerning GDPR and data compliance, which all employees must attend.

## Monitoring and continued development

Our Data Ethics initiatives are anchored with our management team and supported by our Egiss Academy ensuring Egiss' continued efforts within data ethics and data protection.

Egiss has identified a set of ESG metrics on governance related to data security and data ethics that we monitor, and we report on our performance in our annual ESG Report.

Egiss will periodically review and revise the principles to reflect evolving technologies, the regulatory landscape, stakeholder expectations, and understanding of the risks and benefits to individuals and society of data use.



## Procedure for adoption and amendments



This policy, and any amendments to it, must be adopted by the Board of Directors of Egiss Group.

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Approved and adopted by the Board of Directors,

*René von Staffeldt Beck, Chairman of the Board*

