

H. J. Hansen Group

Data Ethics Policy

New legislation requiring large companies in Denmark to report on data ethics entered into force on 1 January 2021. The purpose of the legislation is to create transparency regarding how companies work with data and to encourage companies to take responsibility for how they handle personal data and other data.

The H.J. Hansen Group's Data Ethics Policy therefore aims to clarify how we work with data ethics and the use of data, and to establish a framework for ethical data conduct. The policy is anchored in Danish legislation and supplements the H.J. Hansen Group's GDPR Policy, which describes how we process data in an ethically correct, responsible and transparent manner.

The policy is based on the Data Ethics Compass developed by the Government-appointed Expert Group.

The following core elements form part of the policy:

- Self-determination
- Dignity
- Responsibility
- Equality and fairness
- Progressiveness
- Diversity

The policies are implemented through the following measures.

Self-determination

Human self-determination must be a priority in all data processes. Transparency and self-determination must be design requirements in the collection and processing of data. Personal data must therefore not be processed for new purposes that are incompatible with the purposes for which the personal data was originally collected.

Dignity

The company will always prioritise human dignity over profit. We do not sell personal data to third parties. We do not use sensitive personal data, including data relating to race, ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, genetic data, biometric data, health information, or information concerning a natural person's sex life or sexual orientation, in connection with marketing or the promotion of products.

Responsibility

Responsibility means exercising due care when using new technology in order to ensure integrity in everything we do. All employees in the company must contribute to the responsible and ethical processing of data in connection with the further development of IT systems and data processes.

Equality and fairness

The company only uses data that is necessary, relevant and legitimate in relation to the individual and in the interest of the individual, and in a manner that does not expose the individual to discrimination.

Progressiveness

Developments in the use of data take place continuously within the company as part of general optimisation across the value chain and in relation to business partners. Such development must be based on technical and organisational solutions that support ethically responsible data management.

Diversity

Development work relating to IT systems and data processes primarily takes place across the organisation and with the use of external consultants, thereby ensuring the necessary diversity.

Responsibility and breaches of the policy

The company's CEO is responsible for the preparation and updating of this policy and will continuously, and at least once a year, assess whether the policy should be updated to prevent conduct that is not in accordance with data ethics principles.

The day-to-day work with data ethics takes place within the company's relevant business areas.

In the event of perceived breaches of this policy, each employee is responsible for reporting this in writing to the company's CEO and, in critical cases, via the Group's whistleblower scheme.