



Let's go further

Data Ethics Policy

1 INTRODUCTION

EG handles all kinds of data, both business and personal data, and we do that with profound respect for the data owners, encompassing our customers, business partners, users and employees. We acknowledge our obligation to think and rethink carefully every time we receive, collect, handle and store data to ensure that data is used for a right and lawful purpose, demonstrating respect for individuals. Actively addressing data ethics concerns, we integrate ethical considerations into our design, innovation and business processes.

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

2 POLICY STATEMENT

In EG we want to be a trusted data partner, and we pursue that goal being an honest, reliable and accountable software company.

We handle data with care for data security and privacy but also by applying high moral standards to the EG way of working.

We expect our business partners to do the same.

3 WE DESIGN FOR GROWTH AND DEMOCRACY

The solutions we develop should equally benefit our customers and the users of our solutions, harming none of them in any way. When we design and develop our solutions, we constantly evaluate the consequences for our customers, users and society, applying the mindset of privacy by design and privacy by default.

3.1 DATA TRADING

We do not sell to or share data with third parties unless we have a specific agreement with the data owner to do so.

EG may disclose data internally within EG, to suppliers in connection with the general operation of our business.

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

We receive technical data from third party market research companies about visits on our website. We have policies and procedures in place to prevent the disclosure of both business data and personal data and thus the disclosure of information that can be attributed to the individual business or person.

3.2 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 e.g., in marketing and recruitment.

We comply with the rights of the individual data owner, granted under the EU General Data Protection Regulation (GDPR). More information on how we handle personal data can be found in our Privacy Policy here: <https://global.eg.dk/about-eg/treatment-of-data>.

3.3 ACCOUNTABILITY

We always take full responsibility for the data we handle.

In case of security incidents, we have implemented the necessary plans and procedures to handle any such issues in a fast and transparent way with focus on immediate mitigation of the consequences and honest communication to parties concerned.

3.4 EQUALITY

When we design and develop our solutions, we consider how to avoid bias regarding the design and usage of the solutions. We endorse the involvement of diverse user groups in relevant user tests, and we prefer datasets for design with a diversity that reflects the intended users in order to avoid bias.

3.5 DATA PROCESSING IN EG

EG handles data both as data controller and as data processor.

As data controller, we mainly process personal data regarding our employees and job-applicants.

As data processor, we process personal data about a great variety of individuals on behalf of our customers as part of our maintenance, development or hosting of our solutions.

We handle all kinds of data, including sensitive personal data, e.g. a patient's diagnosis.

We only store data we need to store in order to deliver and support the solutions. Further, we always consider the type of data we need to process and for how long we need to store the data.

3.6 TRAINING ON DATA ETHICS

EG's employees must always be well-informed about data ethics, data security and proper handling of personal data. EG has integrated this policy in our awareness and education programs concerning GDPR and data compliance, which all employees must attend and pass.

3.7 MONITORING AND REPORTING

Our Data Ethic initiatives and reporting is organizationally anchored with our EG Security Committee, GDPR Committee and supported by our Group Legal & Compliance department ensuring EG's continued efforts within data ethics and data protection.

Besides, EG 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.

EG 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.

4 POLICY REVIEW AND UPDATE

4.1 POLICY REVIEW

This policy is to be reviewed on an annual basis. The review will be conducted by Group Legal & Compliance and presented to the General Counsel, Vice President for approval.

4.2 POLICY UPDATE

Major changes to this policy are to be approved by the CEO. Minor changes are to be approved by the General Counsel, Vice President.

4.3 REVISION HISTORY

| VERSION | DATE FOR CHANGE | AUTHOR | APPROVED BY | SUMMARY OF CHANGE |
|---------|-----------------|--------|-------------|-------------------|
| 1.0 | December 2021 | PEROH | SALBE | Policy created. |

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|-----|---------------|-------|-------|---|
| 1.1 | December 2022 | PEROH | SALBE | Policy updated no changes. |
| 1.2 | December 2023 | KSTEN | SALBE | Policy updated with non-material changes. |
| 1.3 | December 2024 | PERAN | SALBE | Policy updated with non-material changes. |

5 DOCUMENT MANAGEMENT

| POLICY – DOCUMENT MANAGEMENT | |
|------------------------------|----------------|
| Version | 1.3 |
| Published | December, 2021 |
| Author | PERAN |
| Policy Owner | SALBE |
| Approval date | December 2024 |
| Last Review – date | December 2024 |
| Next Review – date | December 2025 |