

## Data Ethics Policy

This policy contains rules and guidance on data ethics within SANOVO TECHNOLOGY GROUP (“STG”). This policy is an integral part of the business and supplementary the other policies found on our website and in the internal handbook. The policy also serves as the statement, which is required under article 99d of the Danish Financial Statements Act.

*Ethics is about doing the right thing for people and society. Data ethics is about responsible and sustainable collection, use and sharing of data. Data ethics are relevant when the handling of data may have a direct or indirect effect on humans or society. Therefore, IT security and personal data protection are both subjects relevant for considerations on data ethics. As a minimum data ethics should meet the requirements set out in the EU’s General Data Protection Regulation (GDPR), the Charter of Fundamental Rights of the European Union and the European Convention on Human Rights.*

New digital processes and technology is constantly made available in the society, in the business community in general and within STG. This helps us improve our services and interactions with stakeholders. The main driver in many new technologies and processes is data and accordingly the responsibility of handling data ethically is becoming a focus area to support sustainable growth.

For STG it is essential that our stakeholders trust our processing of data. We will focus on protecting data through three perspectives;

- Firstly, STG will assess risks, addressing them through measures and thus maintaining a high level of information security.
- Secondly, STG will focus on compliance, including the rules of personal data law and users' rights when we process data.
- Thirdly, STG has established this policy and other internal ethical rules, to ensure that we, both from an individual standpoint and from the opinion of society, can best maintain our stakeholders trust when we process data.

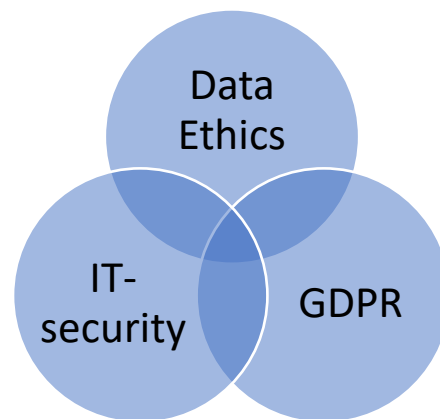
This policy is published as a *guide* to the stakeholders of STG and as *information* to anyone who may have interest in STG’s practice of data ethics.

Our data ethics policy is designed as a framework applying to the Group. The companies within the group are independently responsible for implementing the policy.

The following principles are based on different data ethics topics, which relates to data types that the companies of STG are using, how this data is provided and how we intend to implement new technologies.

## Purpose

This policy establishes the ethical principles that form the framework for STG's processing of data with focus on compliance and IT security. The purpose is also to enable the organization to make ethical assessments of STG's processing of data and assist in the process of handling the ethical dilemmas that may come.



## Scope

This policy applies to all data processing within STG. The policy further applies to personal data as well as other data. In addition, the policy also applies to the handling of selected partners, to the extent that STG can influence these. Finally, the policy also applies to all technologies and processes that are under the influence of STG.

This policy is a supplement to STG's privacy policies, which should always be referred to in relation to the processing of personal information.

## Data Ethical Principles

1. Data processing is conducted legally, fairly and in confidentiality

We handle data in the way we would expect our partners to handle data.

The organization will ensure that the risks of unintended consequences (e.g., disclosure, abuse, or manipulation of data) is reduced to the greatest extent possible when we process data. This is done by focusing on our internal procedures and requiring defined purposes prior processing of data as well as only performing data processing in accordance with laws, rules, and conventions.

2. Data subjects are informed about our collection and processing of data

Whenever we process data, we make sure that the subject has had the opportunity to obtain knowledge of the collection and processing.

3. Data that identifies individuals is processed according to the GDPR

We respect the privacy of individuals.

4. Value, transparency, and security for our stakeholders

We process data to create value in a sustainable way. Part of the sustainable value is secured by applying the necessary technical and organizational methods with regard to what is appropriate from a risk-based analysis. Furthermore, data is generally not sold and passed on unless there is an obligation to do so.

5. Employees are educated on data ethics, security, and GDPR

Through various initiatives we will spread knowledge and best practices among the people of our organization.

6. Responsibility

The responsibility for upholding these principles starts with the management and spreads to every individual along with the knowledge of data ethics. We take responsibility as an organization and also expect every individual to be responsible for acting in accordance with the principles.

## IT-Security

IT and relevant IT-security measures are provided to STG by Thornico IT A/S. We act responsible through our IT procurement process to ensure that we only work with trusted third parties.

Systems are chosen and implemented with security as a key objective. Ethics about how data is used in the system and shared with external parties is part of decision process. STG and Thornico IT collaborates with authorities to increase security and in the event of an actual or potential data breach.

IT policies (including security) is communicated to new employees as part of the onboarding procedure and can always be found on the Thornico and STG (intranet). All new employees using IT-services are also required to complete an IT-security training course and pass the included test no later than three months after their first day of employment.

## Protection of personal data

STG processes personal data from various sources including employees, job applicants, customers, suppliers, and website visitors. The processing is handled in accordance with the various privacy

policies that are available externally and internally; Policies related to employees are found in the employee handbook, policies relevant for job applicants, customers, suppliers, and website visitors are available on the website as well as the cookie policy. All new employees are required to complete a GDPR training course and pass the included test no later than three months after their first day of employment.

## **Review procedure**

This policy is reviewed at least annually by STG's board of directors. The policy forms the basis of the data ethics statement in connection with the management's report.