

Data Ethics Policy

NNIT GROUP

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nnit

Conscience driven. Value adding

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1 Introduction

New digital realities mean new ways of doing business. Just consider the progress achieved over the last few decades, with revolutionary innovation in every industry. Some of the worlds' leading enterprises did not exist 20 years ago, and some have altered their business model beyond recognition. By embracing proactive digital transformation, we all have a unique opportunity to fulfill the potential for growth for any organization and business.

But realizing the potentials of digital transformation should never be at the expense of any persons right to privacy and protection of their data. As we bring sustainable digital transformation to life, we are fully committed to making sure that human rights on data privacy are protected in everything we do.

2 Our Data Ethics Principles

In NNIT, we process large amounts of data on behalf of our customers and within our own organization. Data and information security have always been a fundamental part of NNIT's business, as it is of great importance to us that our customers and employees may always feel safe when entrusting us with their data.

We will uphold data ethics principles in our data processing activities by ensuring data are processed in a fairly manner, with valid legal basis, in line with the fundamental personal data principles and best practices.

NNIT's Data Ethics Principles are embodied in three key principles: security, fairness, transparency.

2.1 Security

As an IT service company data security is an integral part of who we are and an integral part of our solutions. It is the foundation of our NNIT Methodology and the way we think from the beginning of a project to the development and maintenance of the solutions and services we offer.

In order to safeguard high ethical data standards NNIT ensures appropriate technical and organizational security measures are implemented to prevent the accidental or unlawful destruction or accidental loss and alteration or change and unauthorized disclosure of or access to data.

We include vital security features to ensure an appropriate security level when processing personal data such as confidentiality (set of rules that limits access to information), integrity (ensures trustworthy and accurate information) and availability (ensures reliable access to the information by authorized people).

Compliance relies on a combination of technical and organizational security measures:

- Technical access management and technical security
- Procedures and rules
- Control and traceability ensuring enforceability, documentation, and the possibility to investigate possible breaches in data privacy.

By implementing appropriate technical and organizational security measures we ensure business continuity and data protection.

2.2 Fairness

To NNIT, fairness is about doing what is right, and only handle personal data in ways that people would reasonably expect and not use it in ways that have unjustified adverse effects on them. In that regard, NNIT considers whether the use of personal information can be justified, and that processing is compatible with what can be expected in a free and democratic society and in accordance with human rights.

It is about safeguarding the people that our solutions and internal processes affect at the highest priority and without any exemptions. Economical profit or any other material benefit may never override the fundamental rights and safety of an individual. In NNIT, this codex is paramount in our everyday work as a company and in our work with data protection and privacy.

We will take legal and ethics aspect into account when developing new solutions that processes data through a formalized process. We will ensure diversity when creating user-groups for solution development of systems to process data, when we bring solutions to the market that processes data.

We will take measures to ensure our use of data are unbiased and without discrimination and consider the impact of individuals' reasonable expectations. When working with AI, we consider data protection and data ethical matters at an early stage in order to mitigate risks and eliminate or limit possible damage to individuals. We will strive to make sure that any use or development of AI solutions are fair, reliable, and explainable.

2.3 Transparency

NNIT value to be transparent about the data processing activities, and being clear, open and honest about how and why NNIT use personal data.

It is important for us that we are compliant with our responsibility to provide information about processing of personal data, respect individuals' rights and to be transparent about the way our solutions and technology works so that any processing can be justified and explained.

In that regard, we aim to earn the trust of any relationship, with our customers, employees, shareholders, and other stakeholders. It is in truth a testament to our success as a company. Trust is earned over time and it is built with consistency between what is said and what is done. It is our hope and accomplishment to earn and uphold the trust of the people whose personal data we process whether this is done in our role as data controller or data processor.

3 Data processing in NNIT

In NNIT we process personal data as both data controller and data processor.

In our role as data controller, we mainly process personal data about job applicants and our employees provided by the job applicants and our employees themselves. In our role as data processor, we process personal data about data subjects provided by our customers e.g., in connection to the maintenance or hosting of our customer's systems. The type of data we process range from regular personal data, such as names, addresses and phone numbers to sensitive personal data such as health information or union membership.

It is always part of our data ethical considerations, what type of data we are processing, as the security measures must correspond to the sensitivity of the data being processed. Such considerations are also part of our customer dialogue when advising about the software development of their IT solutions, so that privacy-by-design and privacy-by-default is contemplated from the beginning. Embedding data protection into all our processing operations.

The international standard on information security ISO/IEC 27001 is a fundamental part of NNIT's work, and internal audit controls are implemented to secure compliance with both information security and data protection requirements. Further to this, all our employees are continuously and thoroughly trained in the NNIT Methodology, which embodies data protection security through a complete set of guidelines, tools, and templates for planning, delivering, managing, and documenting complex integrated IT solutions.

NNIT does not sell any data to any third parties or profit from it in any other way.

3.1 Data Transfers

NNIT has a global presence, including major operations centers in Denmark, the Czech Republic, China and the Philippines. NNIT therefore engages in Data Processing in the capacity as Data Controller and as Data Processor to third party Data Controllers (NNIT's customers) in different countries and with Personal Data from different countries of origin. NNIT is fully committed to ensuring that such Data Transfers have the requisite level of protection.

When engaging in Data Transfer whereby access to data is provided from one entity to another and where the receiving entity is located outside the EU/EEA, such Data Transfer requires a specific legal basis.

For Data Transfers involving NNIT data or customer data EU Standard Contractual Clauses have been adopted between the NNIT entities.

4 Reporting

NNIT is under requirement to report on Data Ethic Policy in the Annual Report in accordance with International Financial Reporting Standards as adopted by the European Union and further requirements in the Danish Financial Statements Act.

In the Annual Report NNIT will report on the company’s Data Ethics Policy in the Corporate Governance section.

5 Roles and responsibility

NNIT Board of Directors approves the Data Ethics Policy, which is updated annually. NNIT reports on the work with Data Ethics and GDPR to the Audit Committee on a regular basis.

The Executive Management is responsible for the implementation of the Data Ethics Policy within NNIT’s daily operations and activities. This is ensured by establishment of relevant processes and routines for implementation of the policy.

Group Management is responsible for integrating the Data Ethics Policy in the daily operations and to ensure relevant and ethical handling of data within the business areas and units.

The NNIT DPO is responsible for overseeing overall compliance with Data Ethics Policy, including the Data Privacy Policy, as well as issuing guidance and counselling on related matters.

NNIT Legal provides legal business support, including in cooperation with the DPO, on matters concerning data privacy, in particular with relation to contractual matters.

Employees and external consultants with access to NNIT systems are required to be trained, stay updated, adhere to policies, processes and procedures in QPoint when in contact with Personal Data.

6 Approval

The Data Ethics Policy has been adopted by the Board of Directors on 27 January 2022 and reviewed 22 March 2023.

7 Change Log

Effective date	Version	Change description	Author
31-12-2021	1.0	New document with Data Ethic Policy has been made	