



EET Data Ethics policy



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INTRODUCTION

The world is becoming increasingly more digital, connected and data-driven, offering endless opportunities for our customers and for our business. However, with the increasing digitalisation the risk for misuse also arises.

Data ethics concerns the ethical considerations which we as a company must take into account when we use data and new technologies internationally in EET.

Data ethics goes beyond compliance with data privacy laws. We comply with all legal requirements but acknowledge and respect that our use of data (both personal data and non-personal data) may create risks for the users that applicable laws do not cover. We manage these risks by adhering to the principles described below.

Our customers expect us to deliver services that are based on analysis and use of data of many kinds also personal data. The requirements related to documentation also lead to storing increasing amounts of data.

CONTENT

This policy describes how we in EET

- Set responsibility, structure, and processes
- set data ethics principles
- do an ethical assessment of our handling of data
- define a process for how to handle ethical dilemmas

SCOPE

This policy forms the basis for responsible handling of all data in EET (EET Group and all affiliated companies). The policy applies to both data classified as personal information and other data. The policy also applies to third party data handling to the extent EET can impact this. The policy applies to all technologies and processes governed by EET. The policy is a supplement to the policies related to IT security and for the area of personal data regulation (both for employees and customers).

TYPE OF DATA

In EET, we process various types of data, including

- Personal data about job applicants, employees, users of our digital services, and business relations
- Non-personal data about our business customers, operating assets, and other operations.

USE OF TECHNOLOGIES AND SOFTWARES

We use a variety of technologies and software when processing data for business purpose.

DATA ETHICS STRUCTURE AND PROCESSES

The Board of Directors is overall responsible for this policy including adoption and renewal. Decision making on ethical data handling is a responsibility that at the outset lies with every employee in EET. Data ethical considerations must be imbedded in the daily work of every employee, when IT systems and other tools to support the business are designed and developed



and when reports are designed for decision makers. It is therefore important that the data ethics policy is broadly communicated and accessible.

The operational responsibility of corporate systems is led by Group IT function (under the responsibility of the CDO), who will set up structures (e.g. a data ethics council) and processes to assess, operate, train relevant stakeholders and ensure controls

- technology/software purchases,
- third party service and data handling agreements,
- inhouse and subcontracted developments of technology and software etc.

It is important to stress, however, that Group IT is not involved in all activities of this nature across the organisation. Therefore the responsibility also lies with the involved employees regardless of organisational home.

DATA ETHICS PRINCIPLES

We commit to the following data ethics principles:

A. Necessity

There is always a defined purpose of handling data. Data will not be collected, stored, processed, sold, or passed on to third parties unless deemed necessary to provide the agreed service to the customer.

B. Legality

We define the legal basis on which we handle data and whether that is law, consent, contract, or other.

C. Ethical by design

We aim to ensure the rights of an individual in how we design the IT solution. Data obtained from customers are by default the property of the customer and must never be used against the interest of the customer.

D. Consequences

The implications of handling the data to the subjects/owners are mapped prior to defining IT solutions

E. Optional

Where possible we ensure the individual's right to opt in or out where possible in our solutions.

F. Security

We assess and ensure appropriate security levels in and around the IT solutions according to necessary and best available technical and organisational methods.

G. Transparency and control over own data

Where possible we make data handling transparent (also when using algorithms), and we have human controls in place to validate the proportionality.

H. Respect and Human rights

We verify that our solutions do not have a bias towards discrimination, marginalisation, or stigmatisation of individuals.

I. Proportionality

We assess IT solutions from a proportional angle so that not just any goal sanctifies the means.



J. Responsibility

We have clear roles and processes in place for

- responsibility,
- decision processes,
- access controls,
- training of individuals and stakeholders involved in IT solutions design, operation, and use (data handling)
- recurring audit and
- access to complaints.

IMPLEMENTATION AND REVISION

This revision of the policy is the first one of its kind and therefore implementation is in progress. The policy will be revised and submitted for the approval of our board of directors once a year.

CONTROLS

On at least an annual basis the policy will be subjected to internal controls (currently defined and executed by each team concerned) of the above-mentioned principles and the data ethics work will be summarised in a declaration imbedded in the annual financial statement.

Adopted by the EET Group Executive Management November 2023

ROLES AND RESPONSIBILITIES

Roles	Responsibilities
GEM	Responsible for Policy approval and endorsement.
Group HR	Policy owner
Management, employees and contract workers of all entities in the EET	Group Responsible for adhering to this policy