

## DATA ETHICS POLICY

### 1. INTRODUCTION

This policy describes the data ethics of Aalborg Portland Holding A/S and its Danish subsidiaries where Aalborg Portland Holding A/S has a controlling interest. The policy thus includes Aalborg Portland Holding A/S, Aalborg Portland A/S, Unicon A/S and Kudsk & Dahl A/S and is binding on our employees in those companies. Data ethics describe how Aalborg Portland Holding A/S and our Danish subsidiaries collect, process, use, share and erase data. The data ethics policy is thus applicable in all aspects where we process data.

### 2. BACKGROUND

In Aalborg Portland Holding A/S we work actively with personal data protection and data ethics. Data ethics encompass ethical considerations regarding responsible use of data and new technologies. The concept of data ethics comprises the use of all types of data and is therefore not limited to comprise the use of personal data.

Danish regulation requires that all large and listed companies shall give an account of their data ethics policy in their annual report. The purpose of the requirement is to create transparency and focus on companies' work with data ethics.

Personal data and data in general have become more important to people and organisations than ever before, and personal data and data are increasingly processed and stored as digitalisation increases in general. The widespread use and the value of the data put great demands on organisations and their employees' ability to handle data. Aalborg Portland Holding A/S and our Danish subsidiaries store several types of data, and to us it is essential that our employees, customers, business partners and our surrounding world have confidence in our ethical handling of data.

### 3. SCOPE

Ethically correct handling of personal data and data in general is essential in all aspects and is a matter of common interest in Aalborg Portland Holding A/S and our Danish subsidiaries. Our data ethics policy comprises all personal data and data we collect, store and process.

The policy applies throughout the group and is binding on all employees.

Our work with data ethics is operationalised through internal policies and business procedures. Specifically for the processing of personal data, please refer to our [Privacy Policy](#) and [Cookie Policy](#).

### 4. DATA ETHICS

The data ethics policy comprises our processing and use of data. Aalborg Portland Holding A/S and our Danish subsidiaries collect and use the following data types:

- Master data on customers and suppliers (contact information, credit rating, etc.)
- Order history data
- Market data
- Data on existing customers' use of virtual products
- Personal data of employees in connection with employment.

#### Our data ethics values

The processing of data must at all times comply with applicable legislation, including the GDPR.

In general, Aalborg Portland Holding A/S and our Danish subsidiaries work to ensure data minimisation and data protection, and we therefore only collect and store data necessary to fulfil the purpose of the processing.

Our data is processed in ways consistent with the intentions, expectations and understanding of the party who provides the data. Only data necessary to achieve the purpose of the processing is collected and processed. For example, personal data may not be processed for other purposes that are incompatible with the purposes for which the personal data were originally collected.

An adequate level of security is implemented in and around the technologies used to process data. The security measures shall contain technical as well as organisational measures and the necessary level of safety shall be determined on the basis of a risk assessment of the specific processing activity and the technology used for the processing of data.

In Aalborg Portland Holding A/S and our Danish subsidiaries, we work with data in an open and transparent way, and we aim to ensure that we at all times have the necessary competencies to handle data ethics dilemmas. Furthermore, we aim to ensure that our business partners process data in the same way as we would, including according to this policy.

#### The outside world

In addition to our customer relations, Aalborg Portland Holding A/S and our Danish subsidiaries have a wide interface to the outside world. Therefore, we are aware that we also have a broader responsibility when it comes to ethically correct data processing.

In Aalborg Portland Holding A/S and our Danish subsidiaries' cooperation with third parties such as payroll system providers, sales system providers, telecom service providers and data centres, we ensure that third parties protect the data of our employees, customers and business partners.

Aalborg Portland Holding A/S and our Danish subsidiaries enter into data processing agreements with relevant third parties and follow up and check that the third parties comply with the data processing agreements' requirements for processing and storage.

Aalborg Portland Holding A/S and our Danish subsidiaries have deliberately chosen not to ask our customers for the possibility of reselling customer data to third parties. Such a resale would, in our view, be unethical.

### Employees' obligations

All employees of Aalborg Portland Holding A/S and our Danish subsidiaries are responsible for processing data ethically correct. This applies in particular to employees who handle employee data, customer data and data about business partners in their daily work.

Aalborg Portland Holding A/S and our Danish subsidiaries have a continuous focus on ensuring that data is handled as structured as possible and that data is erased when the data is no longer relevant.

Aalborg Portland Holding A/S and our Danish subsidiaries work on a continuous basis with training and education that ensures that the employees process data correctly in their daily work.

## **5. RESPONSIBILITIES AND FOLLOW-UP**

Dilemmas concerning data ethics in Aalborg Portland Holding A/S and our Danish subsidiaries shall be discussed and assessed by our management when such dilemmas arise.

There is an ongoing evaluation of own efforts, actions and policies on data ethics. Such an evaluation shall include an assessment of whether it is necessary or appropriate to make changes to this policy or relevant procedures in Aalborg Portland Holding A/S and our Danish subsidiaries.

It must be ensured that this policy is accessible to the employees and in general to all our stakeholders. The policy is therefore accessible on both our intranet and websites for Aalborg Portland Holding A/S, Aalborg Portland A/S, Unicon A/S and Kudsk & Dahl A/S.