

TDC NETs policy for data ethics and responsible processing of personal data

TDC NET has composed a group policy on employees' handling of personal data. The policy complements the 10 rules regarding the processing of personal data set out in **“Think before you Type”**. The following seven principles form the foundation for TDC NETs approach of working with data ethics.

1. The respect for the privacy of our TDC NET customers and employees, and the privacy of citizens in general are a fundamental value for TDC NET.
2. TDC NET perceives data ethics as holding a higher standard than just complying with existent legislation.
3. TDC NET strives to develop a positive error-culture among employees, where openness about mistakes and problems leads to improvement.
4. TDC NET prioritizes openness and transparency regarding the ongoing challenges in relation to processing personal data on selected cases - that are assessed not to pose a risk of security -, so that companies, organizations, and authorities can learn from each other's experiences.
5. Employees who have access to customers' or citizens' personal data have signed a declaration of confidentiality and have undergone an e-learning class on how personal data should be processed.
6. TDC NET will only disclose customers' and citizens' personal data to authorities if there is an obligation to do so by law, court order

or a ruling by a competent authority. National security and emergency situations constitute exceptions.

7. Machine learning, artificial intelligence and the use of algorithms should be used to set TDC NET's customers and end-users in better positions and not the contrary.

See below for elaborated explanations of each principle:

1. The respect for the privacy of our TDC NET customers and employees, and the privacy of citizens in general are a fundamental value for TDC NET.
 - In situations where privacy must be weighed against other reasonable and essential considerations, privacy must generally be given the highest priority.
 - In cases where this cannot be done, for example as a consequence of legislation or security considerations, an explanation must be given to TDC NET's management.
 - All new business initiatives with significant implications for personal data security and processing personal data must be approved by TDC NET's management, who assess these in relation to the company's legal, financial and data ethical responsibilities.
 - TDC NET protects the safety of processing personal data and ensures that this data is not stored for a longer period than necessary for the purposes for which the personal data in question is processed.
2. TDC NET perceives data ethics as holding a higher standard than just complying with existent legislation.
 - TDC NET complies with both Danish and European rules for data protection. These rules constitute a minimum and a necessary, but not sufficient, basis for TDC NET's engagement with data ethics.
 - The regulatory framework is often behind the opportunities that technology bring. Therefore, TDC NET strives for a proactive approach to data ethics that goes beyond legal compliance.
3. TDC NET strives to develop a positive error-culture among employees, where openness about mistakes and problems leads to improvement.
 - Challenges and dilemmas will inevitably emerge in relation to processing of personal data. We must be able to discuss and solve these issues across employee groups and build up a positive **error-culture**, where errors and problems lead to continuous improvement.

- The prerequisite for such a culture is that employees dare to come forward and admit or point out mistakes.
4. TDC NET prioritizes openness and transparency regarding the ongoing challenges in relation to processing personal data on selected cases - that are assessed not to pose a risk of security -, so that companies, organizations, and authorities can learn from each other's experiences.
- TDC NET strives for faultless handling of personal data, but even with the best standards and procedures, errors, data breaches and leaks will now and then occur, either within ourselves or with our subcontractors.
 - We must learn from these mistakes and will inform customers, management and authorities.
 - TDC NET is covered by a Whistleblower Arrangement in order to make it easier for TDC NET's employees to draw attention to significant circumstances that could constitute a violation of legislation or internal procedures. The system can, as an example, be used in cases where it is assessed that employees have exploited access to systems to obtain information about customers without there being a work-related need. The system can be used anonymously and ensures confidential access to TDC A/S' audit committee and the chairman of TDC A/S' board of directors.
 - TDC NET prioritizes that all employees are well informed regarding data ethics, data security and correct processing of personal data, among other things through ongoing training, education and supplementary education of all employees.
5. Employees who have access to customers' or citizens' personal data have signed a declaration of confidentiality and have undergone an e-learning class on how personal data should be processed.
- As a telecommunications operator, TDC NET inevitable comes in contact with personal data for both customers and citizens, and this data must be treated with care.
 - TDC NET's employees are, through their employment contracts and/or certificates, subject to confidentiality in relation to customers' and customers' personal data. Furthermore, TDC NET requires that selected employees who perform particularly sensitive tasks, where customers' data can be accessed, must be security approved by Danish authorities.
6. TDC NET will only disclose customers' and citizens' personal data to authorities if there is an obligation to do so by law, court order or a ruling by a competent authority. National security and emergency situations constitute exceptions.

- TDC NET is, like all other telecommunications companies, subject to legislation that requires the collection and storage of an amount of personal data. This applies, for example, to collection and storage for use by consumers' ability to object to their bills, and authorities' ability to solve criminal acts, in cases where courts give them access to information held by telecommunications companies.
 - TDC NET demands a court order, ruling by competent authority or injunction as a basis for the disclosure of customers' data. The exception to this is emergency cases, where TDC NET cooperates with authorities in the search for missing individuals, regardless of whether there is a warrant, as well as national security views, where the Center for Cyber Security has a mandate to process data traffic at companies of particularly socially important nature, to protect Danish society from cyberattacks.
7. Machine learning, artificial intelligence and the use of algorithms should be used to set TDC NET's customers and end-users in better positions and not the contrary.
- Machine learning and other technologies are widely used by consumers, businesses and authorities. At TDC NET, we use these technologies to improve the experience for customers and end users and optimize workflows.
 - Upon request, Danish authorities must be able to access and verify the algorithms used to verify that these are not programmed to deliver discriminatory or "biased" results.

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This version is an articulation of the TDC Group Data Ethics Policy
approved by TDC A/S Board of Directors