

Data Ethics Policy



Table of Content

1. Introduction	3
1.1. Purpose and background.....	3
1.2. Scope and objective	3
1.3. Frameworks.....	4
1.4. Impact, risks and opportunities.....	4
2. Data ethics principles	5
2.1. Legislation and data ethics	5
2.2. Collection of personal data	5
2.3. Confidentiality, education and safety.....	5
2.4. E-learning.....	5
2.5. Machine learning, artificial intelligence and use of algorithms	5
2.6. Data minimisation and data quality.....	6
2.7. Transparency and information.....	6
2.8. Data access and sharing	6
2.9. The rights of the data subject.....	6
3. Governance	7
3.1. Monitoring and reporting.....	7
3.2. Governance, ownership and improvement	7
3.3. Consequences for breach of this policy.....	7
4. Speak up and report.....	8
4.1. Speak up	8
4.2. How do I report?	8

1. Introduction

1.1. Purpose and background

The digital society is growing, and data is growing at a faster rate than ever before. This creates both new opportunities and new challenges which need to be handled.

At TDC NET A/S and its consolidated subsidiaries (“TDC NET”), we focus on “Digital Trust” as we work with critical infrastructure and data as our core business. It takes ambition and persistence to create a culture in which digital trust is a top priority. All employees must at all times be aware of their responsibility for the data they are handling.

We commit to maintaining high standards for data ethics and to handling personal data with respect and accountability. This policy is an integrated part of TDC NET’s culture.

This Data Ethics Policy (“Policy”) determines the overall guidelines and principles for TDC NET’s handling and protection of data use and data sharing. This includes personal data in order to ensure that data is handled adhering to legislation, fairness and transparency with respect for privacy.

Definition of personal data

Personally identifiable data is any kind of information that can be related to an identifiable person, also in the event that it is only possible to identify the person from the data when this is in combination with other data.

Personal data may for example include personal identification number, registration number, photo, fingerprint, voice, medical records, or biological material, when it is possible to identify a person from the data or in combination with other data. It is said that the information is “personally identifiable”.

Source: [Datatilsynet](#)

The Danish Data Protection Council (*in Danish: Datatilsynet*)

1.2. Scope and objective

The Policy is applicable to TDC NET’s owners as well as all employees in TDC NET, temporary staff, and all other persons to whom this policy could be relevant (“Employees”). Data protection in the value chain is addressed through TDC NET’s Supplier Code of Conduct.

The objective of this Policy is to secure the right ethically handling of personal data in TDC NET.



1.3. Frameworks

The Policy commits TDC NET to comply with data protection legislation both within Denmark and the EU such as the General Data Protection Regulation (GDPR), e-Privacy Directive and Artificial Intelligence Act. The Policy describes the overall compliance both for existing and future regulations and laws within the data protection sphere.

1.4. Impact, risks and opportunities

TDC NET is committed to apply the principles of double materiality for identifying, ranking, validating and prioritising TDC NET's most material sustainability topics, and assessing the impacts, risks and opportunities (IROs) associated with them. Double materiality assessment (DMA) is stipulated in the European Sustainability Reporting Standards (ESRS). The DMA is necessary to identify the material IROs which direct the sustainability topics TDC NET must report on in the annual report.

It is intended to be the foundation for strategic sustainability planning, budget allocation, risk management and sustainability reporting. The identified IROs and sustainability topics from the DMA will inform TDC NET of its long-term sustainability priorities and strategy, which data-driven targets/key performance indicators (KPIs) to track, as well as which due diligence areas are crucial to prioritise, in order to mitigate risks.

Based on TDC NET's DMA European Sustainability Reporting Standard ("ESRS") S1 Own Workforce and sub-sub-topic S1.3.4 Privacy is deemed material.

2. Data ethics principles

The below principles establish the basis for TDC NET's responsible handling of data and complement the legal measures that TDC NET already has established and conforms to with regards to safety and personal data to secure humans' rights to privacy:

2.1. Legislation and data ethics

The right to privacy of TDC NET's customers, citizens, business partners, and employees is a fundamental value for TDC NET.

TDC NET commits to complying with existing data protection legislation, including GDPR and relevant national laws regulating data protection and privacy. TDC NET regards data ethics considerations as compliance with legislation.

2.2. Collection of personal data

TDC NET only collects personal data on the basis of informed consent from the data subject or on another legitimate basis. We provide clear information on the purpose of the collection, the data subjects rights, and storage periods.

2.3. Confidentiality, education and safety

TDC NET takes relevant technical and organisational measures on the basis of risk assessments to protect personal information from unauthorised access, loss, misuse, or theft. Access to data is limited to authorised employees and business partners who have a work-related need for access and in situations where there is a legal basis for and a factual purpose to handle the data.

Employees who have access to personal data of customers, citizens, colleagues, or business partners have in their employment agreement signed a confidentiality statement, and employees performing tasks of a particularly sensitive nature with access to customers' data must obtain a safety approval from the Danish authorities.

2.4. E-learning

All employees in TDC NET have taken an e-learning course on the handling of personal data. E-learning is sent out every 12 months in order to keep employees' knowledge and awareness of data privacy updated.

TDC NET continuously increase awareness on data ethics and privacy among our employees.

2.5. Machine learning, artificial intelligence and use of algorithms

Machine learning, artificial intelligence, and use of algorithms is solely used to meet the informed purpose of the handling of the personal data. TDC NET emphasizes that the use of these instruments must make the customers and employees better off, not worse off.



2.6. Data minimisation and data quality

TDC NET only collects necessary and relevant data for specific and documented purposes. Further, TDC NET ensures that the personal information handled by TDC NET is correct, updated, and stored according to legislation.

2.7. Transparency and information

TDC NET provides clear and intelligible information on our data handling activities, including the purpose of the handling, data categories, the data subjects' rights, and contact information for the person responsible for data protection in TDC NET.

In case of significant changes to the handling of personal data in TDC NET, the data subjects will be properly notified within the frames described by GDPR.

2.8. Data access and sharing

TDC NET limits the access to personal information to the employees and third parties who need access in order to perform their tasks. TDC NET establishes data processing agreements with third parties to ensure that they comply with the GDPR requirements and comply with the policies prepared internally in TDC NET. TDC NET only hands over personal data of customers, citizens, employees, and business partners to authorities if required by legislation or as a consequence of a court sentencing or an authority decision. National security and situations of necessity constitute exceptions.

2.9. The rights of the data subject

TDC NET respects the rights of the data subjects including the right to access, rectify, erase, and the right to data portability. TDC NET has established procedures to handle these requests within the legislative deadlines.

3. Governance

3.1. Monitoring and reporting

TDC NET's Privacy and Compliance Team continually evaluates the data handling activities to ensure compliance with this policy. Any violation of the policy or the data protection legislation is reported and handled according to an established process including timely notification of the persons who may be involved in an incident resulting in violation of the data protection legislation.

We are committed to transparency and alignment with global best practice. Progress on specific key figures is reported yearly in TDC NET's Annual Report and available publicly on our corporate website. To ensure transparency, TDC NET's reporting is based on current national and international guidelines. Our Annual Report serves as our Communication on Progress submitted to the UN Global Compact and our compliance with the EU's Corporate Sustainability Reporting Directive (CSRD).

3.2. Governance, ownership and improvement

The Policy is maintained and reviewed on an annual basis by TDC NET's Privacy and Compliance Team and the Head of Legal & Regulatory and is approved by TDC NET's Board of Directors. Responsibility for the implementation and upholding of the policy lies with the TDC NET Executive Leadership Team, as well as employees whose work falls within the scope of the policy.

All TDC NET employees and stakeholders must actively participate in the compliance with the data ethics policy and report any concerns or violations.

TDC NET strives to ensure that all employees are aware of the Policy, know where to access it through internal channels and understand its context. The Policy should be read together with TDC NET's package of strategic policies. We are committed to engage our stakeholders to continuously improve our performance in accordance with our stakeholders' expectations. The Policy and other relevant policies are publicly available and can be found on our corporate website.

Please consult compliance@tdcnet.dk for questions or feedback on privacy in TDC NET.

3.3. Consequences for breach of this policy

A breach of the above rules may result in a reprimand, warning, termination, or immediate dismissal, depending on the nature of the breach.



4. Speak up and report

4.1. Speak up

We take our commitment to compliance very seriously and expect all Employees to share that commitment. Employees are expected to speak up if they see, hear or learn of a potentially breach with this Policy.

If you believe there has been a violation of this Policy or suspect any kind of breach, you must report it immediately.

4.2. How do I report?

Our channels for reporting misconduct, unethical behaviour, breach or suspected breach of TDC NET's policies, law or regulation applicable to TDC NET's business and activities include:

- You direct manager
- Any manager
- HR partner
- HRhelseskt@tdcnet.dk
- TDC NET whistleblower portal

You can also take contact directly to the Privacy Compliance Team or your business units Data Protection Manager.

We understand making a report can be sensitive and we will do our best to protect the confidentiality of any Employees raising an issue.

We have zero tolerance for retaliation.



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