

# DATA ETHICS POLICY



KGL. HOFLEVERANDØR

*Harboe*

HARBOES BRYGGERI

# DATA ETHICS POLICY

## Introduction

Harboes Bryggeri A/S produces and markets beer, soft drinks and malt-based products in Denmark, Germany and a wide range of international markets. In connection with its business activities, Harboe collects and uses a range of data.

The purpose of Harboe's data ethics policy is to describe the framework for data collection and use by the company in order to ensure good ethical behaviour, accountability and transparency in its processes. At the same time, the policy is intended to ensure that Harboe complies with current legislation and follows developments in good data ethics.

## Data used

Harboe collects and uses data about customers, suppliers and other partners that are relevant to the operation and development of the Group's business activities. All Harboe's customers and suppliers are registered companies, so the amount of personal data from external parties is very limited.

Internally, business-related data are recorded, including employee personal data.

## Data collection

Data are collected primarily via Harboe's own systems and through regular communication channels. All data are recorded in the Group's ERP system or on the Group's file drive.

## Use of data

Harboe primarily uses data for operation and development of the Group's activities, as well as for analysis, statistics, case processing and customer service.

There are internal procedures for processing data. Collected data are treated confidentially and not communicated to external parties.

Harboe carries out recurring information and training sessions for employees as part of its implementation of the Group's Code of Conduct. These sessions also include confidentiality, handling and protection of data and IT security.

Access to data in the Group's systems is controlled by permissions that are determined based on business needs and with a focus on confidentiality and security.

When implementing new technologies and IT systems, Harboe focuses on maintaining IT security and data protection.

## Responsibilities

The Board of Directors is responsible for drafting and updating this policy. The Board of Directors assesses whether the policy needs to be updated on an ongoing basis and at least once a year. Day-to-day work on data ethics takes place in the company's relevant business areas. The Group's legal department is responsible for adherence to the GDPR requirements in force at any given time. Reporting on Harboe's work on data ethics is handled by the Group's IT department, which reports significant risks to the Executive Board.

## Data ethics compass

Harboe's data ethics policy is based on the Group's Code of Conduct and includes a data ethics compass, designed in accordance with the recommendations of the Data Ethics Council. The values form the starting point for the day-to-day handling of data and use of the Group's IT systems.

### Self-determination

People must retain as much control over their own data as possible

### Equality and fairness

Technology must not discriminate

### Dignity

Inherent human dignity must be prioritised over profit

### Progressivity

Societal advances in the use of data can be achieved through the use of data ethics solutions

### Responsibility

All parties must be responsible for the consequences of their technological solutions

### Diversity

As many professional groups as possible, of different genders, ages, ethnicities, etc., should be involved in the development of technological solutions

## Approval

This policy was approved by the Board of Directors of Harboes Bryggeri A/S on 28 April 2022.

**Harboes Bryggeri A/S**

Spegerborgvej 34

DK-4230 Skælskør

Tel. +45 58 16 88 88

CRN (CVR): 43 91 05 15

post@harboe.com

harboe.com



KGL. HOFLEVERANDØR

**Harboe**

HARBOES BRYGGERI