

Account: Account to Scandlines' data ethics policy 2021Applicable for: Scandlines Infrastructure ApS & its subsidiaries

Objective: The overall purpose of this document is to provide the account on the data ethics policy for Scandlines Infrastructure ApS and its subsidiaries being the statement for section 99d in accordance with the Danish Financial Statements Act.

Recipients: All

Validity: This account is valid for 2021.

In 2021, we have developed and implemented a policy on data ethics. This policy is a supplement to our existing GDPR policies and data protection statements. The data ethics policy is relevant in scenarios requiring thoughtful and responsible decision-making where existing laws and regulations do not necessarily provide clear ethical guidance. This can include, but is not limited to large-scale use of non-personal data, technological development and evolving risks. The policy describes the fundamentals regarding the handling of data for Scandlines as well as the applied security measures. For example, we will only disclose data to authorities if there is an obligation to do so according to legislation and authority decisions. Further, we will only apply machine learning, artificial intelligence, and the use of algorithms to improve the services Scandlines delivers to our customers, and to boost openness and transparency about Scandlines' activities and social impact. An internal organization has been set up to ensure its implementation and training of relevant employees. Further, mechanisms for reporting of non-compliance are described.

The Data Ethics policy in its most current version can be found here:

https://www.scandlines.com/media/ahjnkiay/group-policy_dept-name_data-ethics_final2.pdf

For questions please contact: Data Protection Committee

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