



Data Ethics Statement

2021

Data Ethics Statement 2021

Policy

In 2020, Royal Unibrew adopted the Policy on Data Ethics. It was reviewed by the Board of Directors again in 2021 without any changes made.

The policy establishes the overall guidelines and principles for how data ethics is considered and included in the use of data as well as design and implementation of technologies, especially new technologies, used for processing of but not limited to personal data in Royal Unibrew.

The policy is based on the 10 principles on data ethics elaborated by the Danish Council for Digital Security and sets the general guidelines as well as specific details on relevant topics, such as legality, ethical design, consequences of processing data, security, transparency, and respect for human rights. The policy is available at [Royal Unibrew.com](https://www.royalunibrew.com).

Governance

The existing GDPR Steering Committee (CFO, CIO, SVP Human Resources and VP & Group General Counsel) is responsible for the data ethics policy and its implementation, while the practical compliance with the policy is incorporated in the existing data protection compliance program in Royal Unibrew.

Activities in 2021

In 2021, we continued application of our data ethics policy including an ongoing and increased focus on GDPR (General Data Protection Regulation) and data ethics in procurement and implementation of new IT-systems. The most significant project involving more in-depth aspect of data ethics was implementation of our digital employee master data project based on the SAP application Success Factors. Before and during its implementation a thorough evaluation of data security, access rights, data minimization and other data ethical issues were conducted. It is our belief that the digitalization will reduce data ethical, GDPR and security risks compared to the existing manual and paper systems.

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Employee training program

Our employee training program is differentiated to accommodate the diverse nature of our business and potential exposure to data ethical and GDPR related issues. During 2021, several employee groups had their GDPR refresher training, which included aspects of data ethics. The program will be continued in 2022.