

GUBI

DATA ETHICS POLICY

3 March 2022

GUBI

1 OBJECTIVE AND SCOPE

- 1.1 The objective of this policy (the "**Policy**") is to formally state and ensure that GUBI Group ApS and its subsidiaries (collectively "**GUBI**")
- (a) conducts its business in an ethical manner;
 - (b) does not use data against the legitimate interests of individuals and/or groups; and
 - (c) complies with the requirements set out in section 99d of the Danish Financial Statements Act which GUBI is subject to.

2 BACKGROUND

- 2.1 As stated in GUBI's Code of Conduct, GUBI will actively work to ensure that all information is handled responsibly and in accordance with all applicable standards, policies, and laws.
- 2.2 Data ethics is about responsible and sustainable use of data as well as genuine transparency in data management.
- 2.3 GUBI fully acknowledges that the digital development results in increased use of data and that the use of data enables new and innovative ways of improving the operations of GUBI and to the benefit of customers, suppliers and employees.
- 2.4 GUBI recognizes that data ethics is the step further than the mere compliance with personal data protection legislation ("GDPR"). The Policy covers use of all data types and is thus not limited to the use and protection of personal data comprised by GDPR.
- 2.5 The Policy complements e.g., the principles of transparency and data minimisation in the Data Protection Act as well as rules on integrity and confidentiality. The Policy also supplements GUBI's policies on handling of personal data, use of cookies, etc.
- 2.6 The Policy is mainly aimed at existing and future partners, customers, suppliers, visitors to our website (gubi.com), as well as employees with GUBI.

3 TYPES OF DATA

- 3.1 GUBI uses and processes data in various functions such as sales, marketing, and finance etc. and data (including on various social media platforms) is an integral part of GUBI's work. It is of great importance to GUBI that partners, customers, suppliers and employees may always feel safe when entrusting GUBI with their data. Having solid data helps make better decisions which ultimately benefit society and the end-users.
- 3.2 Data will typically consist of general personal data but also behavioural data regarding GUBI's customers, partners, suppliers and employees. Data is obtained either directly from the data subject or via a third party.

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4 USE OF DATA AND THIRD PARTIES

- 4.1 All data is securely stored, thus always ensuring data availability in the unlikely event that one of the data centres should be exposed to technical failures.
- 4.2 GUBI strives to use and administer any data in an impartially and objective manner and with integrity.
- 4.3 When GUBI uses data obtained from a third-party, GUBI expects that the said third-party (i) is in lawful possession of this data, (ii) can legally assign the rights to use this data, and (iii) general prioritises the efforts for data protection and demonstrate ethically correct handling of data.
- 4.4 GUBI does not resell data or in other ways share data for commercial purposes with any third-party nor does any third-party profit from GUBI's (non-public) data in any other way.
- 4.5 Please note that GUBI may share and disclose data if such disclosure is required by law, regulation or any governmental or competent regulatory authority.

5 COMPLIANCE AND MONITORING

- 5.1 The Policy is owned, operationally monitored and enforced by GUBI.
- 5.2 The Executive Management will use best endeavours to establish a strong culture of awareness and active involvement in data ethical questions and is liable for implementing the Policy in the GUBI organization through training and communication.
- 5.3 The daily work with data ethics takes place in the various relevant business areas in GUBI. The manager of each business area is responsible for notifying the Executive Management in case of use of new technologies that potentially may entail changes to the Policy. The Executive Board monitors the input received by the managers and observance in general.
- 5.4 All changes to the policy must be adopted by the Board of Directors and the policy must be reviewed on an ongoing basis and at least once a year.

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GUBI's management team reviewed, discussed and approved the Policy at management meeting held on 21 January 2022.

Approved and adopted by the Board of Directors on 3 March 2022.