

# POLICY ON DATA ETHICS

**Green Hydrogen Systems A/S**



## **1. Introduction**

- 1.1 This policy describes how data ethics is considered and included in the use of data and design and implementation of technologies, especially new technologies, used for processing of data within Green Hydrogen Systems A/S (the “Company”). The policy applies in all aspects of processing of data which enables identification of a natural person (“Personal Data”).

## **2. Principles for data ethics**

- 2.1 When the Company processes Personal Data or designs, purchases or implements technologies, especially new technologies, for processing of Personal Data, the principles for data ethics described below must be assessed and included in the considerations during the design process and/or prior to the purchase or implementation of the processing activity or the technology used for the processing of Personal Data.

### **2.1.1 Necessity**

Only Personal Data which is necessary to fulfil the purpose of the processing activity shall be collected and processed. For example, it shall be considered whether it is possible to achieve the purpose of the processing with anonymised data instead.

### **2.1.2 Legality**

The processing of Personal Data shall, at all times, comply with applicable legislation. For example, the processing of Personal Data requires a specific legal basis according to the General Data Protection Regulation (“GDPR”).

### **2.1.3 Ethical design**

Technologies for the processing of Personal Data, especially new technologies, shall be designed to respect principles of data ethics, including the principles laid down in this policy and the general processing principles as laid down in the GDPR. For example, technologies shall be designed to ensure correct and timely deletion of Personal Data in accordance with the Company’ retention periods.

### **2.1.4 Consequences**

The consequences of the processing activity and the technology used for the processing activity shall be considered, especially where new technology is used for the processing of Personal Data. In such case, the consequences for the individuals, both on short term and long term, shall be considered.

### **2.1.5 Expectations**

Personal data shall be processed in ways that are consistent with the intentions, expectations and understanding of the disclosing party. Thus, Personal Data may not be processed for new purposes which are incompatible with the purposes for which the Personal Data was originally collected.

#### 2.1.6 Security

A sufficient level of security shall be implemented in and around technologies used for processing of Personal Data. The security measures shall include technical as well as organisational measures, and the sufficient level of security shall be assessed based on a risk assessment of the specific processing activity and the technology used for the processing of Personal Data.

#### 2.1.7 Transparency

Personal data shall always be processed in a way which ensures transparency, especially where algorithms are used for the processing. Furthermore, when the processing activity includes automated decision making for decisions which have legal or similarly significant effects, the results shall be subject to human review.

#### 2.1.8 Respect for human rights

Processing of Personal Data and the design of technologies used for processing of Personal Data shall ensure that human rights are respected. For example, processing of Personal Data or use of technologies for the processing of Personal Data may not be biased with a risk of discrimination, marginalisation or stigmatisation against individuals.

#### 2.1.9 Proportionality

Personal data shall be processed only for purposes which are proportional taking into account the rights of the individuals, including the right of privacy. Thus, a proportionality assessment shall always be carried out before beginning new processing activities or implementing or designing technologies for the processing of Personal Data. If the proportionality assessment shows that the processing is not proportional, the processing activity may not be initiated.

#### 2.1.10 Accountability

The Company shall be able to demonstrate that this policy is complied with. Thus, the considerations relating to these principles for data ethics shall be documented in relation to all processing activities, designs or choices of technologies.

Furthermore, the Company shall conduct and document audits to ensure continuous compliance with this policy in accordance with section 5 below.

#### 2.1.11 Training of employees

The Company ensures that employees who, as a part of their job with the Company, process Personal Data or are engaged in designing, purchasing or implementing technologies for the processing of Personal Data, receive training in the principles for data ethics described in section 2 above, at least once a year.

If the Company finds that certain employees need additional training or more frequent training than described above in section 3.1, the Company ensures that such employees receive the training deemed necessary to ensure compliance with this policy.

The Company ensures that this policy is available to employees, e.g. on the intranet, with the purpose of ensuring the employees' access to the applicable principles for data ethics for the Company.

### **3. Decisions**

- 3.1 Decisions regarding the Company' processing of Personal Data, including design, purchase or implementation of regular technologies for processing of Personal Data, are made by the relevant managers in e.g. IT, HR and finance departments.
- 3.2 Decisions regarding the Company' use of new technologies, e.g. artificial intelligence, to the processing of Personal Data, including for which purposes such technologies may be used, are made by the Executive Management.

### **4. Evaluation**

- 4.1 Dilemmas in the field of data ethics within the Company shall be discussed and assessed by Executive Management whenever such dilemmas arise.
- 4.2 At least once every year the Company evaluates efforts, actions and policies of the Company in the field of data ethics, including in relation to the use of new technology. Such evaluation shall include an assessment of whether it is necessary or appropriate to make any changes to this policy or relevant procedures of the Company.

### **5. Review and amendments**

- 5.1 This data ethics policy may be amended at any time by the Board of Directors by simple majority.
- 5.2 The Board of Directors shall review and assess the adequacy of this policy on an annual basis and to ensure that it always reflects the Company's data ethics considerations.

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Adopted by the Board of Directors on 7 April 2021

### The Board of Directors

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Thyge Boserup

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Troels Øberg

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