

DATA ETHICS POLICY FOR ALLER

Aller A/S and all subsidiaries ("Aller") applies the following principles:

Self-determination

Human autonomy must be a priority in all data processes. In Aller's work with ethical data processing, our starting point will always be that individuals are in control when data is handed over to us and that transparency can be achieved in the individual data processes. Transparency and self-determination must be design requirements in all new data processes.

Privacy

The processing of data is done with respect for the privacy of the customer and under the protection of personal data. Aller processes personal data in accordance with our privacy policy, and only processes personal data that is necessary to fulfil the purpose of the processing.

Personal data must be processed in ways that are consistent with the data subject's intentions, expectations and understanding. For example, personal data may not be processed for new purposes incompatible with the purposes for which the personal data was originally collected.

Contact person

Questions to this report may be addressed to Peter Deurmann (Head of Legal, Aller A/S) or Morten Krüger (Group CFO, Aller A/S)

Accountability

Accountability is exercising due diligence in the use of new technology to ensure propriety in everything we do. Everyone in Aller must contribute to the responsible and ethical processing of data. That is why we work with risk assessments that not only address data protection requirements, but also include an assessment of ethical accountability.

Security

A "best practice" level of security must be implemented in and around the technologies used to process data. The security measures shall include technical as well as organizational measures and the level of security required shall be determined on the basis of a risk assessment of the specific processing activity and the technology used for processing data with the individual in mind.

Equality and necessity

Aller only uses personal data that is necessary, relevant and legitimate in relation to the individual, without exposing the individual to discrimination or stigmatization.

