

Genan Data Ethics Policy

1. Introduction and objective for data ethics

The purpose of this policy is to account for the general collection and use of data at Genan in order to ensure transparency. This Data Ethics Policy is supplemented by the Genan Personal Data Processing Policy, two versions of which are available on our website, www.genan.eu: one for customers and business partners and one for job applicants.

Genan's objective for this Data Ethics Policy is to adopt an at all times responsible use of data as well as to create transparency in the company's data processing and development of data.

The ethical conduct of Genan in relation to data must contribute positively to customer security and create business value at the same time. The Data Ethics Policy of our company is based on our business model and values.

2. Data used

Genan uses both personal and non-personal data. It is primarily data gathered at meetings, customer data, sales data, production data, data related to deliveries and consumer data – all in connection with normal company operations.

3. How is data collected?

First and foremost, data will automatically be collected and processed in Genan's own systems in connection with one or more deliveries of Genan's services.

Genan also makes use of external suppliers for the collection and processing of data – in connection with customer and market research.

When cooperating with third parties, we ensure that third parties safeguard respective data. Genan makes data processing agreements with relevant third parties, following up and making certain that these third parties comply with the processing and storing requirements of these data processing agreements.

4. Processing (confidential) data

Employees accessing customer data, supplier data, personal data, company data etc. have signed a non-disclosure agreement and a confidentiality clause; and they have been instructed in the processing of personal data.

5. Storing customer data

The Genan Data Ethics Policy is based on the assumption that the data surrendered to the company by a customer is the customer's own data, and that data is processed in compliance with applicable law.

To ensure the integrity of each customer, transparency in respect of Genan's data registration in relation to each individual customer is a must. Genan's customers are e.g. entitled to request insight into their own personal data, and in connection with such request to access personal data, we must e.g. inform said customer which personal data we have registered and processed about him/her – and account for the justified reason for this processing.

To ensure the self-determination of customers in respect of the data we store about them, Genan is constantly working to process data as structured as possible, so we always have an overview of data registered and processed in relation to each individual customer.

Genan continuously deletes personal and other data which is no longer relevant. The purpose of this ongoing deletion is to prevent Genan from storing more information about our stakeholders than necessary. Data is stored and deleted in compliance with the EU General Data Protection Regulation (GDPR).

For further information about personal data, we make reference to the Genan Personal Data Processing Policy, two versions of which are available on our website, www.genan.eu: one for customers and business partners and one for job applicants.

6. Use of data

Genan primarily uses data collected for statistics, analysis and development with a view to ensuring an optimisation of company services. The use of data in daily work life is furthermore operationalised through internal procedures and policies – across the entire group.

When designing data systems at Genan, we ensure that internal and external systems are safe for all population groups to use, so that system designs create an equal and dignified groundwork for all. Genan will furthermore, at all times, refrain from using data in a way, where data processing creates an unjust and/or prejudiced balance in connection with the categorisation of customers, employees, suppliers etc.

Data collected by Genan – or by external suppliers on behalf of Genan – are not sold to any third parties.

7. New technologies / artificial intelligence

In connection with the use and installation of new technologies and IT systems, Genan's IT Department will be involved and be responsible for ensuring IT security. Moreover, data used will be scrutinised to clarify whether personal data is involved, and if this is the case, Genan's GDPR responsible will be involved to ensure correct data protection.

For further information in connection with the processing of personal data, we make reference to the Genan Personal Data Processing Policy.

8. Identification of data leakage, data error and non-conforming data

Genan endeavours to process personal data without making any mistakes. In the event of data leakage and / or other challenges, we must learn from such mistakes; and we can only improve, if we speak openly about them, if we notify customers, management and authorities, and if we

communicate publicly about the challenges that we encounter. The prerequisite for such culture is that employees dare come forward and admit or point out mistakes.

In order to make it easier for the employees of the company to point out significant circumstances which could constitute a violation of either the law or internal procedures, Genan has set up a whistleblower scheme. This scheme could e.g. be used in cases where employees assess that others have misused system access to obtain data although no work-related need exists. The scheme can be used anonymously and ensures confidential access to the chairman of the board of Genan.

For further information about the Genan Whistleblower Scheme, we make reference to the Genan Whistleblower Policy accessible on the Genan website: www.genan.eu.

9. Training of employees

It is Genan's priority that employees are well informed about data ethics, data security and the correct handling of personal data – e.g. through continuous (further) training and education of all employees processing such data in connection with their work.

10. Management responsibility

Genan's management is responsible for the preparation and updating of this policy – and continuously – and at least once a year – evaluates whether the policy should be updated.

Management is furthermore overall responsible in connection with decisions, use and implementation of new technologies as well as the use of personal and non-personal data.

Every-day work related to data ethics is performed in the relevant business areas of the company.

Viborg, 9 March 2022

Poul Steen Rasmussen

Group CEO