

DATA ETHICS POLICY FOR FAIRWIND A/S

Introduction

This data ethics policy outlines the principles and practices that govern the collection, use, and sharing of data at FairWind A/S. We are committed to protecting the privacy and security of our customers' and employees' data, and to conducting our data practices in an ethical and responsible manner. This policy applies to all data that is collected, used, or shared by FairWind A/S in the course of our business activities.

1. DATA ETHICS PRINCIPLES

1.1. Respect for Privacy

We respect the privacy of our customers and employees, and will collect, use, and share their data only for legitimate business purposes. We will obtain consent from customers and employees where required by law and will provide clear explanations of how their data is being used.

1.2. Data Transparency

We will be transparent about our data collection, use, and sharing practices. We will provide clear and concise information to customers and employees about the types of data we collect, how we use it, and with whom we share it. We will also provide information on their rights to access, correct, and delete their data.

1.3. Data Security

We will take appropriate measures to protect our customers' and employees' data from unauthorized access, use, and disclosure. We will use industry-standard security measures to safeguard data and will regularly review and update our security practices to ensure they meet the highest standards.

1.4. Fairness

We will use data fairly, without discrimination or bias. We will ensure that our data practices do not unfairly impact vulnerable groups and will seek to minimize the impact of our data practices on these groups.

1.5. Compliance

We will comply with all applicable laws and regulations related to data privacy and security. We will hold ourselves accountable for meeting these obligations and will establish processes to monitor and ensure compliance.

2. DATA ETHICS PRACTICES

2.1. Data Collection

We will only collect data that is necessary for legitimate business purposes. We will obtain consent from customers and employees where required by law and will provide clear information on the types of data we collect and how it will be used.

2.2. Data Use

We will use data only for the purposes for which it was collected and will not use it for any other purposes without first obtaining consent. We will also ensure that data is accurate and up-to-date and will take appropriate measures to correct any inaccuracies.

2.3. Data Sharing

We will only share data with third parties where necessary for legitimate business purposes. We will ensure that appropriate safeguards are in place to protect the data and will obtain consent from customers and employees where required by law.

2.4. Data Retention

We will retain data only for as long as necessary to fulfill the purposes for which it was collected and will securely dispose of it when it is no longer needed. We will establish processes to regularly review and dispose of data that is no longer necessary.

2.5. Data Access

We will provide customers and employees with access to their data upon request and will allow them to correct or delete their data where appropriate. We will establish processes to handle requests for access, correction, and deletion of data.

2.6. Data Training and Awareness

We will provide training and awareness programs to our employees on data ethics and privacy and will ensure that they understand their responsibilities in protecting customer and employee data. We will also ensure that our employees are aware of this policy and understand how to comply with it.

2.7. Data Governance

We are committed to upholding the principles of this policy, and our management and IT department will continue to work with it, complying with existing and new rules and policies within the area of data ethics.

By adhering to these principles, we aim to build and maintain trust with our stakeholders while fostering an ethical and responsible culture of data handling within our organization.

Version	Date	Reason	Responsibility
1.0	09/06-2023	Full revision	DPO & CO and ESG team