



Data Ethics Policy

Approval

This data ethics policy has been approved by management on December 8, 2021

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Introduction

In relation to the provisioning of electricity supply services by European Energy, some data is being collected. The purpose of this policy is to explain this data collection and the use hereof by European Energy A/S, in order to ensure transparency in its policy. This data ethics policy is complemented by European Energy's overall IT security policy and personal data policy.

Data collection

The types of data used by European Energy can be both personal identifiable and non-personal identifiable. Personal identifiable data is mainly B2B related data e.g., business customer data including delivery data, contract information and contact persons. Data is collected directly by European Energy, but European Energy also use external suppliers in connection with the data processing and collection. This will always be in agreement and on behalf of European Energy. In the event that the data processed by a 3rd party contracted by European Energy contains personal identifiable, a data processor agreement will be put in place to ensure that the supplier adheres to European Energy's data policy, when processing personal identifiable data on our behalf.

How data is collected

The collection and processing of data is primarily automatic in European Energy's own systems and in connection with one or more deliveries of European Energy's services.

Use of data

European Energy primarily use the collected data for statistics, analysis, case management and development to ensure an optimization of European Energy's services within competitive and environmentally friendly electricity supply.

In cases where privacy must be balanced in relation to other reasonable concerns, privacy should be given preference. Data collected by European Energy, or a 3rd party on behalf of European Energy, is not sold to 3rd parties and no automatic, or other artificial intelligence processing is used in administrative proceedings or decisions. European Energy safeguards the handling of personal data and ensures that this data is not stored for a longer period than necessary, in relation to technical, functional and legal purposes for data storage. The use of data in day-to-day work is also operationalized through internal procedures and policies across the entire European Energy.

New technologies

In connection with the use and installing of new technologies and IT systems, European Energy's IT department will be involved and responsible for ensuring IT security. In addition, there will be an investigation into whether the data used contains personal identifiable data and if so, European Energy's GDPR team in the legal department will be involved to ensure the inclusion of the Data Protection Regulation. For more information regarding the processing of personal identifiable data, please refer to European Energy's IT security policy and personal data policy.

Responsibility

The overall responsibility for decisions, the use and implementation of new technologies and the use of non-personal identifiable and personal identifiable data is entrenched by European Energy's management, which is continuously involved and informed in the decision process regarding the implementation of new technologies in European Energy.

The data ethic compass

Based on the Recommendations of the Data Ethics Council and the Expert Group from November 2018 and this policy on data ethics, data is used based on the data ethics compass below.

<p>SELF-DETERMINATION</p> <p><i>"Man must retain as much control over his own data as possible"</i></p> <p>European Energy A/S only collects and processes necessary data and strives for transparency.</p>	<p>PROGRESSIVITY</p> <p><i>"Societal progress through the use of data can be achieved through the use of data ethics solutions"</i></p> <p>New technology will be continuously involved – but always in accordance with the ethical considerations set out in this policy.</p>
<p>EQUALITY AND JUSTICE</p> <p>"Technology must not discriminate"</p> <p>European Energy A/S does not use technology that can discriminate.</p>	<p>ACCOUNTABILITY</p> <p><i>"All links must be responsible for the consequences of their technological solutions"</i></p> <p>European Energy A/S trains employees in sound and ethical data management and demands the same for third-party suppliers.</p>
<p>DIGNITY</p> <p><i>"The inherent dignity of man must be weighted over profit."</i></p> <p>Consideration of the individual is taken into account by European Energy A/S</p>	<p>DIVERSITY</p> <p><i>"As many professional groups as possible with different genders, ages, ethnicities, etc. must be involved in the development of technological solutions"</i></p> <p>European Energy A/S does not discriminate on gender, age, ethnicity, etc.</p>