

Data Ethics Policy

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1. Introduction

This policy describes Sydbank's approach to sound data ethics and the principles applying to how Sydbank processes data in an ethical, responsible and transparent manner.

Sydbank takes its responsibility as data controller seriously as we wish to be perceived as a respected, competent and decent business partner that complies with legislation in force and monitors developments in good data ethics. Sydbank's data ethics policy must ensure this.

2. Background

Personal data and data in general is more important to companies than ever before and personal data is increasingly processed and stored in line with ever more stringent documentation requirements regarding the Bank. The widespread use and value of data place heavy demands on companies and their employees' ability to process data.

Sydbank stores many types of data as well as large volumes of data. For Sydbank it is essential that our customers and the surrounding world can have confidence in our ethical handling of data. Sydbank's data ethics policy makes our approach to data processing even clearer.

3. Scope

The ethical handling of data and personal data is a concern common to all the Bank's business units.

Sydbank's data ethics policy is based on the personal data that we store and process but the policy also applies to other data processed by Sydbank. The policy comprises the entire group and encompasses all employees.

The activities concerning data ethics are operationalised through internal policies and business procedures. In particular as regards the processing of employees' personal data, reference is made to the internal booklet concerning the personal data of employees which is administered by the Bank's human resources division.

4. Data ethics

The data ethics policy is based on the Bank's processing of customer data, its internal efforts and Sydbank's external environment.

In connection with its final report to the government in November 2018 the Danish Expert Group on Data Ethics introduced the data ethics value compass which organisations are encouraged to use in their efforts to pursue an ethical data policy. Sydbank's data ethics policy is summarised in 6 below using the data ethics value compass.

Customers

Sydbank's data ethics policy rests on the premise that data provided by customers belongs to customers and is processed within the scope of the law. There must be transparency around Sydbank's storage of data with regard to the individual customer to ensure the customer's integrity.

Storage and use of customer data

Sydbank's customers are entitled to request for instance insight into their personal data and in connection with a request the Bank must disclose eg which personal data we store and process about the customer and on which basis such processing takes place.

In order to ensure customers' self-determination over data stored about them, Sydbank works continuously to ensure that data is processed in the most structured manner possible so that there is always an overview of which data is stored and processed about the individual customer.

Offers to customers

Sydbank's offers to potential and existing customers depend on a number of factors, including the customer's creditworthiness, the Bank's desired risk, the customer's business transactions with the Bank and how Sydbank's product portfolio suits the customer. This is why the terms offered to customers vary and are based on an individual assessment of the customer and his/her circumstances and not only on the basis of data processing as this creates an unfair balance with regard to the categorisation of customers.

Misuse and leaks

Sydbank's storage and processing of customer data must protect customers' rights and dignity and at the same time ensure confidence and prevent misuse. Consequently Sydbank does not use or process data to obtain knowledge that is against customers' long-term interests. Sydbank works consistently to protect the Bank's customers against misuse, eg by means of leaks, in order to prevent third parties from being able to use any kind of data.

Deletion of data

Sydbank works continuously to ensure that personal data and other data that is no longer relevant is deleted. The ongoing deletion is to ensure that Sydbank does not retain more information about its customers than is necessary.

Sydbank's internal efforts

Employees contribute to ethical and responsible processing of personal data and other data and their contribution is a precondition for Sydbank's customers and the outside world maintaining trust in Sydbank's overall processing of data. Consequently Sydbank has strengthened the organisation in this area in recent years.

Efforts regarding EU's General Data Protection Regulation (GDPR) and information security

Sydbank takes responsibility for its data processing. This is also why Sydbank invests time and resources on an ongoing basis in proper storage and processing of customer data.

Sydbank has a dedicated GDPR department tasked with helping the Bank's Data Protection Officer (DPO) to oversee and analyse the Bank's processing activities focusing on GDPR compliance. Similarly Sydbank has an information security department tasked with helping the Bank's Chief Information Security Officer (CISO) to ensure a high level of data security. The fact that these efforts fall under the responsibility of the DPO – 2nd line and the CISO – 1st line helps to ensure that the entire data area is handled properly and continues to be given priority.

Employee obligations

All employees at Sydbank are responsible for ensuring that Sydbank processes data in

an ethical manner. This applies in particular to employees whose daily work involves customer data and in connection with advisory services.

At Sydbank constant focus is on ensuring that customer data is processed in the most structured manner possible and that data is deleted when no longer relevant.

Sydbank continuously works on training and education to ensure that its employees process data correctly.

This applies in particular to Sydbank's advisers meaning that they are not allowed to process personal data other than personal data that is relevant to their job. Consequently advisers are not allowed to obtain information from a customer's accounts eg about the customer's actual spending without prior agreement with the customer.

External environment

In addition to its customer relationships, Sydbank has a broad interface with the surrounding world. Consequently we are conscious of our wider responsibility also with regard to ethical data processing.

Third party requirements

In its collaboration with third parties, for instance data processing centres, Sydbank ensures that third parties protect customer data.

Sydbank enters into data processing agreements with relevant third parties and follows up and checks that third parties comply with the data processing agreement requirements as regards processing and storage.

Sydbank has deliberately chosen not to ask its customers about the possibility of selling their customer data to a third party. Such a sale would be unethical in our opinion.

Data – also a social responsibility

At Sydbank we are aware of our corporate social responsibility, also when it comes to data ethics and data processing. This is why we collaborate with the authorities and fulfil our obligations to make data available when requested to do so.

Sydbank also collaborates with the authorities in terms of money laundering and other criminal activity where Sydbank reports relevant information if we record activities of which the authorities should be aware.

5. Responsibility and follow-up

The Board of Directors is responsible for preparing and updating this policy. The Board of Directors assesses on an ongoing basis and at least once a year whether the policy should be updated.

The day-to-day activities concerning data ethics are carried out in the Bank's business units.

The Group's reporting on data ethics is the responsibility of a number of functions at the Bank, including Compliance, Risk, the Bank's DPO and CISO, which report significant risks to the Bank's Group Executive Management.

6. Sydbank's data ethics summarised using the data ethics value compass

<p>Self-determination The starting point of Sydbank's work with ethical processing of data will always be that data provided by customers belongs to customers. This ensures the best self-determination for customers.</p>	<p>Equality and fairness Sydbank will at all times refrain from using data in a manner which creates an unfair balance in terms of the categorisation of customers.</p>
<p>Dignity Sydbank will always ensure the dignity of customers by not using data against customers' interests and will ensure on a regular basis good data protection practices in terms of leaks and misuse.</p>	<p>Progressiveness Sydbank's data processing involving efficient ethical data solutions must promote a positive development in society. Therefore we also collaborate with relevant authorities on data solutions to ensure a positive development in society and to fight crime.</p>
<p>Responsibility Everyone at Sydbank must work to ensure responsible and ethical processing of data. As a result systematic efforts are made with regard to data processing both as regards data collection and data processing.</p>	<p>Diversity In connection with data system design at Sydbank, we ensure that all population groups can safely use Sydbank's systems, internal as well as external, so that the system design creates an equal and dignified basis for everyone.</p>