

## 1. Introduction

At North Media A/S (“**North Media**”), we are aware that an increased level of digitalisation comes with great responsibility. This is why we work according to data ethics principles that go beyond the general statutory requirements for data protection and provide a framework for North Media’s use and storage of all types of data.

It is important to North Media that customers, suppliers, business partners, investors, employees and others are comfortable with the way in which North Media processes data and that they trust that North Media will keep their data safe and protected.

This policy is complemented by the privacy policy of North Media A/S, including the privacy policies of North Media’s subsidiaries:

- FK Distribution’ privacy policy
- BoligPortal’s privacy policy
- Ofir’s privacy policy
- Bekey’s privacy policy

## 2. Purpose and scope

The purpose of this policy is to establish the overall principles for ethically correct, responsible and transparent data processing in the North Media Group. These principles apply to the use and processing of personal data and non-personally identifiable data, e.g. anonymised, aggregated and non-personal data. The policy also applies to data created by North Media through the use and development of technology to the benefit of our customers.

The policy has been adopted by the Board of Directors and must be observed by all employees, business segments, corporate functions and subsidiaries of the North Media Group. Other natural or legal persons, including suppliers, consultants, business partners, etc., must accept to observe this policy when acting on behalf of North Media.

The policy complements North Media’s corporate guidelines for compliance with data protection legislation and is applied and implemented on a day-to-day basis through group-wide procedures and policies. A common purpose of data ethics and GDPR rules is to protect the individual, which is why this policy also reflects some of the GDPR obligations.

Managerial employees of North Media have a special responsibility in this respect. They are expected to set a good example and ensure that the employees in their respective areas of responsibility are aware of and comply with the policy.

North Media has a compliance organisation in place to monitor and offer guidance on the data protection rules as well as the rules of this policy.

## 3. Data ethics principles at North Media

Based on the recommendations of the Danish Data Ethics Council issued in November 2018 and this Data Ethics Policy, North Media has defined the following principles on data ethics.

### 3.1 Transparency and rights

To the extent permitted and appropriate, North Media's data processing, and especially our use of algorithms, must be transparent. For that purpose, North Media will always communicate on the use of data in an easy-to-understand language and in an easy-to-access format so that it is clear

- which data North Media has collected, where the data derive from and the purpose for which the data will be used;
- which data North Media will share and with whom and for which purpose they are shared;
- to which extent data will be processed through algorithms and the potential consequences of this for the individual person.

To this end, North Media has set up processes to ensure that data subjects will have easy access to, insight into and control of what their data are used for.

Moreover, North Media has processes in place making it easy for data subjects to give and withdraw their consent and to object to the processing of their data.

### 3.2 Security

North Media applies high standards for data protection. It is crucial to North Media that all data are processed in a secure and responsible manner. The security measures applied include technical, organisational and physical measures. North Media regularly verifies that the Group's data security is sufficiently secure and robust.

Employees of the North Media Group are bound by a duty of confidentiality stipulated in their employment contracts with regard to any information of which they gain knowledge during the course of their employment. The duty of confidentiality continues to apply after the employment relationship has ended.

North Media regularly provides training and education to ensure that the Group's employees process data in an ethically correct manner. North Media encourages openness about errors and problems so that North Media is able to continually enhance data security.

In the event of a suspected personal data breach involving risks to the relevant data subject(s), the incident will be investigated immediately in order to mitigate any loss caused by the breach and to ensure that the authorities and the data subjects are notified as soon as possible.

### 3.3 New technology

If North Media uses or develops algorithmic models, machine learning or artificial intelligence technology, North Media will do so only if it benefits society in general as well as our customers.

North Media focuses intensively on the quality of the data basis to minimise the risk of any bias or discrimination in the use of technology towards the data subjects. Therefore, North Media regularly verifies that technologies are transparent, reliable, fair and non-discriminatory, and easy to understand.

Both employees and data subjects must have a real possibility of understanding the use of new models and technologies.

North Media has set up processes to ensure that new technologies are designed to respect and comply with the general principles of processing laid down in the GDPR. For example, new technologies must be designed to ensure correct and timely erasure of personal data in compliance with the storage periods defined by North Media and to support the principle of purpose limitation. Data used in the model must be collected in a lawful manner that safeguards the right of individuals to protect their privacy.

The Danish authorities may at any time on request verify, within their domains of supervision, that algorithms developed by North Media are not programmed to provide discriminatory or prejudiced results.

### **3.4 Third parties**

North Media demands high standards from third parties, expecting all third parties to act ethically correct and in compliance with applicable laws and regulations.

North Media enters into data processing agreements with relevant third parties and follows up and verifies that such third parties comply with those agreements.

## **4. Reporting**

As a listed company, North Media is required to supplement the management commentary with reporting on the Group's data ethics policy in compliance with section 99d of the Danish Financial Statements Act.

For that purpose, North Media reports annually to the Board of Directors on the Group's data ethics work.

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This policy was approved by the Board of Directors of North Media A/S on 2 December 2021.

*This document is an unofficial translation of the Danish original. In the event of any inconsistencies, the Danish version shall apply.*