



Data Ethics Policy

Clipper Data Ethics Policy

Introduction

The purpose of this policy is to define Clipper's position on data ethics pursuant to section 99d of the Danish Financial Statements Act.

The Data Ethics Policy for Clipper applies to all employees and others given access to Clipper's IT systems, in or outside of Clipper's physical boundaries.

Clipper acknowledges that all data, including but not limited to personal data, is valuable. We comply with all legal requirements but acknowledge that our use of data may create risks for the users that applicable laws do not cover. We manage these risks by adhering to the principles in this policy and by training our staff continuously to be aware of our policy.

Sources of data

In Clipper, we collect personal data about job applicants, employees, users of our digital services, and business relations. Clipper also collects non-personal data about our commercial business and other operations.

We are committed to handling all data – both personal and non-personal data - with integrity and the highest respect. We strive only to collect data, which is necessary for a given purpose, and to store all data in a secure way. We have taken measures against the impermissible use of data. Data is only shared on a need-to-know basis.

Use of technologies

We use a variety of technologies when processing data and we have taken measures against misuse of data.

Data Ethics Principles

We commit to the following data ethics principles:

Transparency and openness

It is highly important for Clipper that we strive to ensure that our data ethics principles always remain clear and easily understandable.

Use of data and privacy

We have high standards as to how and where we collect data, and we have high standards as to how we use the data:

- We set high standards for ourselves in collecting data from our systems and other sources.
- We only collect data that is needed for a purpose and in accordance with applicable laws and regulations
- We do not collect personal data which may be considered as data-driven surveillance.
- We do not collect data that may infringe on somebody's personal privacy

Accountability and security

We take measures to ensure that all data is secured and protected against impermissible use. We train our employees to handle all data with the highest respect and in accordance with the rules and guidelines set at all times to protect all parties.

Processes & Policies

This policy is supported by our IT Security Policy & our HR Personal Data Handling Policy.

Governance & Reporting

Each year we will account for this policy in accordance with section 99d of the Danish Financial Statements Act.

Approval

This policy was approved by the Board of Directors of Clipper on 28 November 2022.