	<b>ISO Certification – 9001 / 14001 / 45001</b> <b>HCS policy for data ethical values</b>	Document – <b>KMAS 05.2e</b>
		ISO ref.: 05

## Introduction

This policy describes our data ethics at HCS A/S Transport & Spedition (hereinafter simply referred to as “HCS”) and too group companies where HCS has a controlling influence. The policy thus covers the entire group and obliges all employees. Data ethics includes how HCS collects, processes, uses, shares and deletes data. The policy on data ethics thus applies in all aspects where we process data.

## Background

Personal data and data in general are of greater importance to individuals and organizations than ever before, and personal data and data are being processed and stored to a greater and greater degree as digitalization in general increases. The widespread use and value of data places great demands on organizations and their employees' ability to handle data.

HCS stores many types of data, and for us it is essential that our stakeholders and the outside world can have confidence in our ethical handling of data.

## Definitions

### Data controller

HCS is the data controller for our business partners (customers and suppliers), where only necessary data is collected about the company data that is necessary to carry out our tasks, and to be able to meet requirements from various authorities.

### Data processor

HCS is a data processor for our employees in the organization where this is required in order to meet requirements from various authorities. An ethically correct handling of data and personal data is essential for all areas of HCS and data ethics policy is based on the personal data and data we hold.


## Application

An ethically correct handling of data and personal data is essential for all areas of HCS and data ethics policy is based on the personal data and data we hold.

## Our data ethics values

- We work as standard with data minimization and with data protection - and registers and therefore store only necessary data.
- We strive to ensure that our use of data is not discriminatory against, for example, gender, race, ethnicity or communities.

Doc. no.:	<b>KMAS 05.2</b>	Valid as of:	01-07-2022
Dev. of:	KHE	Ver. no.:	1
Approved by:		Page 1 of 3	Rev. date: 01-01-2023

	<b>ISO Certification – 9001 / 14001 / 45001</b> <b>HCS policy for data ethical values</b>	Document – <b>KMAS 05.2e</b>
		ISO ref.: 05

- We work with data in an open and transparent way.
- We strive to ensure that data is not used in a way that misleads our stakeholders.
- We strive to ensure that our users, both internally and externally, get as much value as possible from the data we collect.
- We strive to ensure that we possess the necessary competencies to deal with data ethics dilemmas.
- We strive to ensure that our business partners process data in the same way as we would, including in accordance with this policy.

In continuation of the above values, it can be added:

When HCS processes data and designs, purchases or implements technologies, including new technologies, our data ethics values and principles apply.

Only data necessary to fulfill the purpose of the processing are collected and processed. For example, it is always considered whether it is possible to achieve the same purpose by collecting anonymised data instead of personally identifiable ones.

The processing of data must at all times comply with applicable law. For example, the processing of personal data under the General Data Protection Regulation (“GDPR”) requires a specific legal basis.

Data processing technologies, in particular new technologies, must be designed to comply with the principles of data ethics, including the principles set out in this policy and the general processing principles as described in the GDPR. For example, technologies must be designed to ensure correct and timely deletion of data in accordance with HCS’ deletion deadlines.

The consequences and risks of new activities, systems and technologies that are specifically used to process data must always be considered, thought through and documented before they are used.


Data must be processed in ways that are consistent with the intentions, expectations and understanding of the issuing party. Thus, for example, personal data may not be processed for new purposes which are incompatible with the purposes for which the personal data were originally collected.

An adequate level of security must be implemented in and around the technologies used to process data. The security measures must include technical as well as organizational measures, and the necessary level of security must be determined on the basis of a risk assessment of the specific processing activity and the technology used for data processing.

Data must always be processed in a way that ensures transparency, especially in cases where algorithms and automated processes are used for data processing. When the processing activity includes automated decision-making regarding decisions that have legal or similar significant impact, there must also be a subsequent human review of the results.

In the processing of data and the design of the technologies used for the processing of data, it must be ensured that human rights are respected. For example, data processing or the use of data processing technologies must not be biased, so that there is a risk of discrimination, marginalization or stigmatization of individuals.

Doc. no.:	<b>KMAS 05.2</b>	Valid as of:	01-07-2022
Dev. of:	KHE	Ver. no.:	1
Approved by:		Rev. date:	01-01-2023

	<b>ISO Certification – 9001 / 14001 / 45001</b> <b>HCS policy for data ethical values</b>	Document – <b>KMAS 05.2e</b>
		ISO ref.: 05

Personal data must only be processed for purposes that are proportionate, taking into account the rights of the individual, including the right to privacy. Therefore, a proportionality assessment must always be performed before starting new processing activities, or before implementing and / or designing technologies to process data, including in particular personal data. If the proportionality assessment shows that the treatment is not proportionate, the treatment activity must not be started.

It must be ensured that this policy is accessible to employees and, moreover, to all our stakeholders. The policy is therefore included both on HCS 'internal network and on hcs.dk.

Decisions regarding HCS' data processing, including the design, purchase or implementation of data processing technologies, such as artificial intelligence (AI) for data processing, must be made by the relevant managers who have the necessary knowledge of the content of this policy.

## Application

Dilemmas in data ethics in HCS must be discussed and assessed by the relevant managers in HCS when such dilemmas arise.

There is ongoing evaluation of own efforts, actions and policies within data ethics, including the use of new technology. Such an evaluation should include an assessment of whether it is necessary or appropriate to make changes to this policy or relevant procedures in HCS.

January 2023  
Mads Frederiksen, CEO

Doc. no.:	<b>KMAS 05.2</b>	Valid as of:	01-07-2022
Dev. of:	KHE	Ver. no.:	1
Approved by:		Page 3 of 3	Rev. date: 01-01-2023