
March 2022

Data ethics policy statement, cf. section §99 d of the Danish Financial Statements Act

This statement is part of the management report in Brødrene Hartmann A/S' annual report for 2021 covering the period 1 January to 31 December 2021.

In 2021, Hartmann supplemented the group's existing data protection efforts with a policy on data ethics, which reflects Hartmann's commitment to manage data responsibly based on principles of honesty, transparency and accountability. Hartmann adheres to these principles in addition to applicable legislation to ensure that employees, customers, suppliers and consumers feel safe when entrusting the group with their data.

Hartmann primarily processes data relating to human resources, customer interactions and supplier contact. The group controls that data is collected for explicit and legitimate purposes and processed legally and fairly, including that data processing only comprises the data necessary to realise the purpose of the processing. Simultaneously, the group strives to ensure that the collected data is adequate, relevant and accurate at all times. Data responsible employees ensure that personal data is not stored longer than necessary, that data processing respects privacy, and that stored data is protected against unlawful destruction, alteration and disclosure. Hartmann enters into data processor agreements with third parties and does not sell data.

Any violation of the policy on data ethics or Hartmann's internal procedures may be reported by employees through the group's whistleblower system. No reports were filed in 2021.

The policy on data ethics is approved by the board of directors annually and revised on an ongoing basis.