



# Data Ethics Policy

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March 2022





## **1. Introduction and Purpose**

- 1.1 Data ethics refer to taking a stance to ensure that data is not used against the legitimate interests of individuals. Ethics primarily concern principles that arise from human conscience and attitudes about how to basically behave in society. There are already several comprehensive requirements in law for personal data processing, confidentiality, and privacy when companies process your personal data. The GDPR sets a clear framework for the use and storage of personal data, but in no way removes the difficult ethical choices and dilemmas that increased digitalisation brings. Data security is a prerequisite for talking about data ethics.
- 1.2 GreenMobility is driven by technology. The company's platform has multiple interfaces, including an app, which the customers use for all interaction with our fleet. On the backend side, all systems are cloud-based, which means we do not store data locally and which significantly reduce risk of security breaches.
- 1.3 This Data Ethics Policy has been adopted by GreenMobility in accordance with Section 99d of the Financial Statements Act.
- 1.4 GreenMobility thinks of data ethics as transparency, customisation, and data security:

## **2. Transparency**

- 2.1 It must be clear what you agree to, why and how your data is relevant to offers, is stored and what it is used for within the applicable legal framework.
- 2.2 You must be given the opportunity to find out what data GreenMobility holds about you. This ensures the best self-determination for the customer.
- 2.3 Transparency is provided on who GreenMobility shares your data with. This can be public authorities.
- 2.4 GreenMobility takes special care to inform you about how it collects and uses data when offering you products.
- 2.5 The company openly discloses how it works with data ethics and what data ethics choices have been made.

## **3. Customisation**

- 3.1 Data can enable personalised offers. When data is used for personalisation of the user experience, it must always be in the interest of the customers.
- 3.2 GreenMobility will always ensure the dignity of customers by not using data against the customer's own interests.

## **4. Data security**

- 4.1 Data security is a prerequisite for talking about data ethics. GreenMobility continuously works to have a high level of security so that your data is taken care of in the best possible way.
- 4.2 Employees of GreenMobility must contribute to responsible and ethical data processing.
- 4.3 IT systems shall be developed with customer data security in mind, while incorporating ethical considerations for data use and disclosure.
- 4.4 Should a critical data leak or similar occur, GreenMobility will communicate promptly and clearly to relevant authorities and parties.

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This Diversity Policy has been adopted by the Board of Directors of the Company in March 2022 and is available on the Company's website.