



IC GROUP A/S

DATA ETHICS

Report 2021/22

Statutory report on data ethics

Data ethics goes beyond compliance with data privacy laws. We acknowledge and respect that our use of data may create risks for the users, and therefore we manage these risks by adhering to the following principles. We do our utmost to ensure that we are and remain fully compliant with all legal requirements in our use of data

At both of our independent operating subsidiaries, we have a GDPR Audit Committee set up, which meet with regular intervals throughout the year and include representatives from Legal, IT, HR, Ecom, Marketing etc. The purpose is to follow up on our work related to the processing of personal data, to identify gaps/risks and to take corrective actions when needed. We work with a so called "Mitigation Plan" – which is basically a list of gaps identified between how we work and what GDPR requires and agreed actions to be taken to close the gap. At the end of each calendar year, Legal conducts a GDPR audit to monitor compliance and prepares a GDPR Audit Report, to which we attach the latest version of the Mitigation Plan.

Use of data

We process different types of data, including:

- Personal data about job applicants, employees, users of our website and app, customers, and representatives of our suppliers and business partners
- Non-personal data about our operating assets and other operations.

We strive for high data ethics standards for the use of both personal and non-personal data. We use a variety of technologies when processing data. Data collection is important to fulfil our business purpose.

We have high standards in relation to what data we collect, where we collect data from and how we use the data.

When it comes to processing of personal data, we are continuously working with ensuring that we fulfil the GDPR and other applicable data protection regulations.

In relation to processing of personal data about customers and other users of our web shop and digital services, including members of our loyalty program, we refer to the websites of our two brands – www.tigerofsweden.com and www.bymalenebirger.com, which include detailed descriptions of the brands' privacy policies as well as their cookie policies.

We also have several internal Privacy Policies, such as a General Privacy Policy, a HR Privacy Policy, a Policy on the Data Subjects' Rights, a Procedure on Data Protection Impact Assessments, and a Procedure on Security Breaches.

We continuously follow up that our internal and external Privacy Policies are adhered to and, in case of gaps identified, take actions to ensure compliance going forward.

Our Data Ethics Principles

We commit to the following data ethics principles:

Equality and fairness:

We must strike a fair balance when using data in the business. Data processes must not discriminate and must be fair in all aspects including using machine learning and data processing.

Transparency:

We uphold transparency and openness concerning our use of data. We ensure that our data ethics principles remain clear, understandable, and easily accessible.

Dignity:

Human dignity is respected in all data processing. Data is not used to exploit data of individuals. We secure, that we have our customers and other data subjects prioritized before commercial interests.

Self-determination:

Every human has a self-determination in all data processes. An individual should have control over their own data, including control of what data is collected, what they are used for and in what contexts.

Accountability:

We are responsible for the data in our possession and all data collection involves human decisions. Therefore, we strive to require governance of data processes for all parts of our organization. We assess and document permissible uses of our data and systems and take measures to avoid impermissible uses.

Governance and reporting:

Each year we will account for this policy in accordance with section 99 d of the Danish Financial Statements Act. Processing of data must be done with respect for basic guarantees of legal certainty and the level of legal certainty in society.