

# POLICY ON DATA ETHICS

Center for Digital Dannelse

July 28, 2023



# 1. INTRODUCTION AND PURPOSE

Welcome to the Data Ethics Policy of Center for Digital Literacy (Center for Digital Dannelse). Our organization is dedicated to ensuring an ethical and responsible treatment of data. We value privacy, data protection, and compliance with applicable laws and regulations.

This policy is designed to describe our commitment to respecting individuals' privacy and protecting their data. By adhering to our Data Ethics Policy, we aim to maintain trust and respect among our customers, users, and stakeholders by ensuring that their data is handled in an ethical, responsible and secure manner.

Our Data Ethics Policy includes the following principles:

## 2. COMPLIANCE WITH LEGISLATION AND REGULATION

Our organization collects and processes data in accordance with relevant data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR), Personal Data Act, and E-Privacy Regulation. This ensures that our data processing is in compliance with the relevant legal requirements and rules.

## 3. RESPONSIBLE DATA PROCESSING

### 3.1. Consent

We obtain consent from affected parties before processing their personal data, unless the processing is based on other valid legal grounds.

### 3.2. Data Minimization

We commit to only collecting and processing necessary data to fulfill our legitimate purposes. We avoid unnecessary data collection.

### 3.3. Data Access Guidelines

Data access is restricted to authorized employees who require the data for their job tasks. Access is managed and logged to ensure data protection.

Data access for customers is restricted to authorized users who collect and require the data for the purpose of their use of the Services supplied by our organization. Access is managed and logged to ensure data protection

### 3.4. Data Retention and Deletion

We retain data for the necessary time to achieve our purposes and securely delete them when they are no longer relevant. Retention periods are observed in accordance with applicable law.

We respect individuals' rights to control and manage their own data and provide appropriate options for accessing and deleting personal information.

## 4. DATA PROTECTION AND SECURITY

### 4.1. Information Security

We implement technical and organizational measures to protect data from unauthorized access, loss, or misuse.

## 4.2. Anonymization and Pseudonymization

When appropriate, we anonymize or pseudonymize data to protect individuals' identities and our customers' data.

## 4.3. Reporting Data Breaches

We have procedures in place for identifying, reporting, and handling data breaches or security incidents.

# 5. TRANSPARENT COMMUNICATION

We communicate clearly with affected parties about how their data is collected, processed, and used. This includes informing them of the purpose of data processing and any third-party agreements.

# 6. EDUCATION AND AWARENESS ACTIVITIES

We ensure that our employees and partners are educated and aware of the importance of data ethics and their responsibilities regarding data processing.

# 7. THIRD-PARTY AGREEMENTS

We only enter into agreements with reliable third parties that meet our standards for data processing and data protection. Written agreements with appropriate data processing terms are established.

# 8. REVIEW AND REVISION

We regularly review and update our data ethics policy to ensure compliance with the law and business needs.

## 9. ADOPTION

**Adopted by:** Centre for Digital Literacy (*In Danish:* Center for Digital Dannelse ApS)

**Date of Adoption:** July 28, 2023

This data ethics policy serves as a guideline for our employees and partners to ensure that we treat data with responsibility, integrity, and respect for individual privacy and rights.