Data ethics statement 2021

This statement is made pursuant to §99d of the Danish Financial Statements Act and sets out the steps NTG has taken and is continuing to take to ensure that data is used in a responsible and sustainable manner within its business and supply chain.

Introduction

In the transport and logistics industry, each day vast volumes of data are generated, for example through vehicle locator systems and CCTV monitoring systems.

Over the years, NTG has become increasingly digitized, more devices and control systems are connected online. While this represents incredible opportunities, it also represents challenges. Some of these challenges entail ethical dilemmas.

This statement covers use of all data types and is thus not limited to the use and protection of personal data. Hence, the statement complements NTG's Data Protection Policy which covers for example the principles of transparency and data minimization which are set forth in the European Union's General Data Protection Regulation (GDPR).

Types of data, usage, and security

Data is an inherent aspect of arranging and supervising transport for our customers. Data can for example be related to our customers, visitors to our websites, our employees, but also to the control and management systems of our operations, such as freight forwarding management systems which process and respond in real time to data. Further, we use artificial intelligence systems to analyse data and translate it into solutions which can assist us in optimizing our operations.

Data which is handled by NTG will typically be regarding our employees, customers, business partners, and/or third parties which includes general personal data but also behavioural data. Data is obtained either directly from the data subject or via a third party.

NTG strives to always have policies in place ensuring that data is only being used for the purpose it was obtained. To ensure accountability for data ethics on a sufficient Group level decisions related to investments in new technologies and use of data are anchored within Group IT.

Data security is crucial in ensuring data privacy and data protection. NTG has implemented technical safeguards and procedures to ensure proper data management and prevent any unauthorized use or disclosure.

Third party data policy

We perform due diligence on third parties who interact on behalf of NTG with the government, for example a third party providing custom handling services or an agent. Latter approach ensures that these third parties have a good reputation and handle data responsibly.

When we use data from third parties, for example processed through a transport management system, we expect that third parties are in lawful possession of this data, do not misuse data and can

legally give NTG the right to use this data. To safeguard that suppliers handle data in an ethical manner, NTG requests its suppliers to comply with its Code of Conduct for suppliers or to ensure compliance with a document which is similar to NTG's Code of Conduct.

We do not resell data but if legally required, we provide data in accordance with applicable legislation, court, or authority decisions.

Usage of artificial intelligence systems

If we use artificial intelligence systems and / or algorithms in connection with for example providing freight forwarding services or optimisation of our operations or internal processes, we strive to ensure that the data is accurate, updated, complete, and that the technology in question does not deliver results that may be discriminatory or biased. NTG uses mainly systems which do not make automated decisions but is committed to a better understanding of how its artificial intelligence systems impact data subjects' lives.

As an example of NTG's use of artificial intelligence systems, can be mentioned NTG's efforts in creating higher transparency on its level of carbon emissions and to identify relevant sources of greenhouse gas emissions in the operational value chain. In collaboration with its business partners stakeholders, NTG uses artificial intelligence systems to perform annual estimations of its carbon emissions and obtains data from third parties to support initiatives which increase NTG's carbon efficiency and decrease our total carbon footprint.

Employees' awareness about data ethics

As stated in NTG's Code of Conduct our employees are our greatest asset. Therefore, we have implemented a Group-wide online cyber awareness training program. The training program focuses on employee behaviour to ensure a high level of protection against common data and privacy threats such as for example phishing and data management.

NTG monitors how many employees have completed the online training and expects employees to avoid data and privacy risks and to report to their managers, or through NTG's whistleblower system, for example unethical use of data or potential data privacy breaches.

Further steps

NTG will continue to improve its understanding of how data and artificial intelligence systems impact the transport and logistics sector and will in collaboration with its stakeholders strive to ensure that best practices regarding data ethics are implemented.

We will provide online training to our employees to ensure that we are all informed on how to handle data in a responsible and sustainable manner.

To increase data use transparency and clarify data use accountabilities between ourselves and third parties, we will continue to implement a due diligence process and cooperation model with third parties who are handling and/or retaining data for NTG.