

# Data Ethics Policy

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*Falck is a global emergency response and integrated healthcare services company, providing services to companies across different sectors and industries, public authorities, and private individuals. Falck uses data – including personal data – to provide our services, and Falck is becoming a more digitalised and data-driven organisation as part of the global developments in digitisation and the use of data, believing in the value of data to improve healthcare services to the benefit of our customers, clients, patients, and society in general. Therefore, Falck has decided to establish certain ethical principles for the use of data.*

## **Data Ethics**

This policy (the "Data Ethics Policy") describes the overall ethical principles on how Falck uses data.<sup>1</sup>

The term "data" covers data of all types and from all sources, including publicly available data, such as statistical and research data, financial and corporate data, data collected from individuals, and data derived from other data.

Falck is a global company and the principles of the Data Ethics Policy may therefore be applied differently with respect to local cultural and societal norms.

### **The human being at the centre**

Human interests prevail over commercial interests. The human being is at the centre and should have the primary benefit of use of data.

- Data, including personal data, is used in Falck to provide our services to customers, clients, and patients; data, including personal data, about our employees is used in our business operations. Which data is used and for what purpose is always made clear. Often the data will be collected as a contractual requirement from our public or private customers or, as is the case for many of our services, as required by law. Other times, the data will be collected for commercial purposes. In all instances, the interest of the humans is prioritised.
- When data is collected and includes personal data, the purpose will be communicated via privacy notices and policies. When we use personal data in Falck, we also follow our commitments in our Data Protection Policy.
- Data used as part of Falck's business quality management or research is anonymised to the extent possible.

### **Individual data control**

We believe that individuals should have control over the use Falck makes of their data.

- When utilising automated decision-making and profiling in our services, we endeavour to provide clear information on methods and models used to the individual.
- The possibility of human intervention and being able to contest automated decisions is provided to the extent possible.

### **Transparency**

Data usage must make sense for the individual. We strive to be transparent and explain our purpose and interest in using data. We communicate with the individuals via privacy notices and policies. Transparency information also includes information on, e.g., automated decisions and user profiling.

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<sup>1</sup> The Data Ethics Policy is based on the *Principles and Guidelines for Companies, Authorities & Organisations* from the thinktank DataEthics.eu.

- Artificial intelligence (AI) models are continually assessed on quality and possible bias; and we engage with partners to gain insight in the data models and usage.
- In some healthcare services Falck utilises behavioural design and nudging tools. This is to enable and strengthen the users' "good choices" in understanding and improving their own health and wellbeing.

### Accountability and governance

Accountability is an integral part of data use, and efforts are made to reduce the risks for the individual and to mitigate undesirable social and ethical implications.

- In Falck, we endeavour to integrate data ethics in our daily business decisions and strategy managed by relevant global functions and business segments.
- Even with standards, policies and processes, data usage could lead to challenges, problems, and eventually errors. In Falck, we seek to develop a "positive error culture" among our employees to facilitate openness leading to improvement of our services, processes, and systems. The positive error culture is enforced by Falck's strong commitment to a whistle-blower hotline and set out in the Whistle-blower Policy.

The Data Ethics Policy is owned by the Chief Information Officer (CIO). In Falck, we have established a Data Ethics working group comprising global functions and business segment representatives serving as an advisory board to local and global management on data ethical manners. The working group will continue to develop Falck's data ethics principles and provide Executive Management with regular reporting on data ethical issues.

## Data Ethics Principles – Falck’s commitment

The human being at the centre	Individual data control	Transparency	Accountability & Governance
<p style="text-align: center;">✓</p> <ul style="list-style-type: none"> <li>• The usage of personal data in Falck is differentiated related to purpose, often being required by law, or governed by data processor agreements from public or private organisations.</li> <li>• When collected for a commercial purpose, this is communicated via privacy notices and policies.</li> <li>• Data used as part of Falck's business quality management or research is anonymised to the extent possible.</li> </ul>	<p style="text-align: center;">✓</p> <ul style="list-style-type: none"> <li>• When we in Falck use automated profiling, we provide clear information on profiling methods, models, and data.</li> <li>• The possibility for human intervention is prioritised in the extent possible.</li> </ul>	<p style="text-align: center;">✓</p> <ul style="list-style-type: none"> <li>• We strive to be transparent and explain our purpose and interest in using data.</li> <li>• When Falck uses profiling, behavioural designs, we know and can explain the models.</li> <li>• When using Artificial Intelligence (AI), the models are continually assessed on quality and bias.</li> <li>• We engage with partners to gain insight in their data models and usage.</li> </ul>	<p style="text-align: center;">✓</p> <ul style="list-style-type: none"> <li>• Data Ethics is centrally anchored in Falck.</li> <li>• In Falck, we seek to develop a "positive error culture" among employees to facilitate openness about errors and problems.</li> </ul>

Approved by the Board of Directors of Falck A/S on 22 November 2021.

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