Data ethics statement 2022

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.

In the coming years the amount of data will further increase due to regulatory oversight coming from for example the implementation of the EU Mobility Package and the Corporate Sustainability Due Diligence Directive.

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 Privacy policies 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, visitors to our premises, applicants, 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, applicants, visitors to our premises, 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 continuously improves its 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. In the event the third party is processing personal data on behalf of NTG or vice versa, parties will conclude a data processing agreement.

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.

Employees' awareness about data ethics

NTG has 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.

To increase data use transparency and clarify data use accountabilities we map with the use of an IT tool the data flow of personal data between ourselves and third parties.

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.

ADOPTED BY THE BOARD OF DIRECTORS AND ACKNOWLEDGED BY THE GROUP MANAGEMENT OF NTG NORDIC TRANSPORT GROUP A/S 8 MARCH 2023