

Data ethics statement 2023

This statement is prepared in accordance with §99d of the Danish Financial Statements Act and describes the actions 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.

Background

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

In the next years the amount of data will further increase due to further automation of data streams and regulatory oversight coming from for example 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. Therefore, the report 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 essential aspect of arranging and overseeing 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.

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 user behaviour data. Data is obtained either directly from the data subject or via a third party.

NTG is committed to ethical data practices and has policies in place to ensure that data is only used for the intended purpose. Group IT oversees the decisions related to investments in new technologies and data use at the Group level.

Data security is essential for data privacy and protection. NTG continuously enhances its organizational and technical measures and procedures to ensure proper data management and prevent any unauthorized use or disclosure.

Third party data policy

To ensure that suppliers handle data ethically, NTG requires its suppliers to comply with its Code of Conduct for Suppliers or to have a similar document that aligns with NTG's Code of Conduct.

We vet third parties who are acting on behalf of NTG with the government, such as a third party providing custom handling services or an agent. This approach ensures that these third parties have a good reputation and handle data responsibly.

When transferring data to or from third parties, we utilize Data Processor Agreements to define roles and responsibilities between the data processor and the data controller. The agreements ensure compliance with privacy laws, protecting the confidentiality, integrity, and availability of personal data, and define the terms of data processing, including its scope and duration. They also establish clear liability and recourse actions in case of a breach or non-compliance. Additionally, our supply chain management includes conducting GDPR audits and obtaining assurance reports, or equivalent

evaluations via questionnaires, to verify that third parties consistently adhere to the agreement and other contractual duties while handling our data.

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

Artificial intelligence systems and their applications

We make use of artificial intelligence (AI) and machine learning (ML) to improve our services, and to optimize our operations and internal processes. We ensure that the data we use is accurate, updated, complete, and that the technology we use does not produce discriminatory or biased results. We only make use of AI/ML in business processes and do not make automated decisions in our processing of personal information, be it customers or employees,

Data ethics awareness among employees

We have implemented a Group-wide online cyber awareness training program for our employees. The program aims to improve employee behaviour and to protect against common data and privacy threats, such as phishing and data management. We monitor how many employees have completed the online training and we expect them to avoid data and privacy risks and to report any unethical use of data or potential data privacy breaches to their managers or through our whistleblower system.

Next steps

Our protection of data is based on widely known and accepted cybersecurity frameworks, such as ISO 27001 and CIS Controls, and we use data protection compliance tools to map the data flow of personal data between us and third parties, to increase data use transparency and accountability.

We will continue to enhance our knowledge of how data and artificial intelligence systems impact the transport and logistics sector and we will collaborate with our stakeholders to implement best practices regarding data ethics. Lastly, we will provide training to our employees to ensure that we handle data in a responsible and sustainable way.