

Data Ethics Policy 2023

Introduction

Pharma Equity Group has, in accordance with the Danish Financial Statements Act, section 99d and 107b, prepared the following report. (Danish: Lovpligtig redegørelse for virksomhedsledelse, jf. årsregnskabslovens § 107 b).

The statement is part of the management report in the company's annual (latest) report for the period 1 January 2023 – 31 December 2023.

Purpose

Pharma Equity Group A/S ("Pharma Equity Group") and its entities are committed to the protection of privacy and to transparent, secure, and ethical data processing. This Data Ethics Policy sets out the data ethic principles applied by Pharma Equity Group and describes Pharma Equity Group's approach to data processing covering all data types. The Policy is supplemented by the [Privacy Policy](#) and [Cookies Policy](#) as well as IT Security Policy.

Sources of data

In Pharma Equity Group various types of data are being processed, including personal data about job applicants, employees, and business contacts and non-personal data. Pharma Equity Group endeavor for high data ethics standards for the use of both personal and non-personal data.

Data Processing

Data are primarily collected directly from the data subjects and, if relevant and always subject to specific guidelines. Personal data is processed and handled in accordance with applicable rules and regulations, including GDPR. Pharma Equity Group also process large amounts of data that is not personally identifiable e.g., aggregate data, technical data and statistical data. Personal data processed by Pharma Equity Group is not subject to automated decision making, nor is it sold to third parties.

Deletion of data

Pharma Equity Group works continuously to ensure that personal data and other data that is no longer relevant is deleted. The ongoing deletion is to ensure that Pharma Equity Group does not retain more information about the data subjects than is necessary.

Security

Pharma Equity Group's website and connected IT systems are protected against access by technical and organizational security measures also protecting data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure, or access, or accidental or unlawful destruction of or damage.

Processes and policies

Pharma Equity Group will develop additional procedures to ensure that Pharma Equity Group complies with the above- mentioned principles.

Ownership

The Data Ethics Policy is owned, operationally monitored, and enforced by the Pharma Equity Group. All changes to the policy must be adopted by the Board of Directors and the policy must be reviewed at least once a year in accordance with section 99 d of the Danish Financial Statements Act.