

# Data Ethics Policy



## Introduction

This Data Ethics policy outlines Impero's commitment to ethical and responsible use of data in all of its operations.

We recognize that the data we collect, and process has the potential to impact individuals, communities, and society at large.

## Purpose

The purpose of this Data Ethics policy is to establish a set of principles and guidelines for the ethical use of data in all Impero's operations. It will ensure that we meet our obligations to our customers, partners, employees, and other stakeholders, while also promoting transparency and accountability in all our activities.

## Scope

This policy covers the activities of Impero A/S and any of its subsidiaries and the policy applies to all data that Impero collects, processes, and stores in its operations. It applies to all employees, contractors, and suppliers who handle data on behalf of Impero.

This policy also extends to any data that Impero receives from customers or partners.

## Objectives

The objectives of this Data Ethics policy are as follows:

1. To promote ethical and responsible use of data in all Impero's operations.
2. To ensure compliance with all relevant laws, regulations, and industry standards governing data privacy and security.
3. To ensure that all data is collected, processed, and stored in a transparent, fair, and lawful manner.
4. To safeguard the privacy, security, and integrity of all data we handle.
5. To provide transparency and accountability to our customers, partners, and stakeholders regarding our data practices.

## Monitoring and control

This Policy has been adopted by Impero's Board of Directors on 20 April 2023 and adherence to the principles will be monitored at regular intervals. The Executive Management will continue to review and update the Data Ethics policy to ensure that it remains relevant and effective and that we meet our obligations to our customers, partners, employees, and stakeholders while promoting transparency and accountability in all our activities.