

Data Ethics Policy

Table of Contents

1. Purpose and Scope	3
2. Types of Data COP handles	3
2.1. Personal & Non-Personal Data	3
2.2. Safeguarding Mechanisms	3
3. Technologies	3
4. Key Data Ethics Principles	4
5. Policy Awareness	4
6. Policy Exceptions, Local Requirements and Enforcement	4
7. Policy Contact Email	4
8. Policy Review, Monitoring and Approval	5
9. Policy Versions	5

1. Purpose and Scope

Copenhagen Offshore Partners A/S (“COP”) is committed to conducting its business responsibly and with integrity towards all employees and stakeholders across our value chain. As part of this commitment COP manages data in an ethical and responsible manner in all areas and locations of its operations.

The following Data Ethics Policy has been established to provide a description of COPs commitment in relation to Data Ethics, pursuant to section 99(d) of the Danish Financial Statements Act.

The Data Ethics Policy applies to all COP employees and outlines our expectations towards our external stakeholders (i.e., customers, suppliers, etc.).

2. Types of Data COP handles

2.1. Personal & Non-Personal Data

COP process personal data about job applicants, employees, and business relations while Non-Personal Data are related to business operations such as business data, legal documentation, financial documentation, documentation of compliance with various requirements, technical data, etc. COP is committed to process both personal data and Non-Personal data for legitimate purposes and on a “need to know” basis in compliance with data privacy laws.

2.2. Safeguarding Mechanisms

COP is complying with the applicable EU General Data Protection Regulation as well as other local regulations and establishes Privacy and Security policies aiming to minimize the potential risk of misconduct in relation to Data Ethics. These policies are communicated internally & externally, and awareness sessions are organized aiming to ensure that all parties are familiar with their obligations and take ethical decisions.

Additionally, COP has established a safe reporting channel the [Speak Up! Platform](https://whistleblowersoftware.com/secure/COP-whistle-blower) [https://whistleblowersoftware.com/secure/COP-whistle-blower] for reporting misconducts in relation to a wide range of issues, including serious ethical violations.

3. Technologies

COP is using various technologies for data management, which are governed by the key principles listed below and by privacy & security policies in accordance with legal requirements and best practices.

4. Key Data Ethics Principles

COP is in all circumstances committed to following the key principles below, aiming to comply with Data Ethics regulation.

- i) *Purpose limitations*: Only process data for the purposes it was intended to and are related to business operations.
- ii) *Lawfulness*: Having a legal basis, being transparent and acting in the best interest considering all lawful, determined, and legitimate purposes.
- iii) *Data minimization*: Only gather and keep the exact amount of data that is needed.
- iv) *Confidentiality*: Only authorized parties may access data and efficient security measures should be in place for data protection aiming to eliminate data misuse or data leakage (e.g. Cybersecurity threads)
- v) *Accuracy*: Take all the reasonable measures for data accuracy in terms of quality & quantity.
- vi) *Accountability*: All parties managing data are accountable to comply with relevant laws and regulations
- vii) *Storage Limitation*: Only store data on a “need to have” basis and consider the legal requirements and risks while defining the retention period.



5. Policy Awareness

COP ensures this policy is available and accessible to internal and external parties via COP’s official communication channels. Specifically:

- ✓ via COP’s official [website](#)

6. Policy Exceptions, Local Requirements and Enforcement

There are no exceptions to this policy. Each year, COP will account for this policy in accordance with Section 99 (d) of the Danish Financial Statements Act.

7. Policy Contact Email

Should you have any questions, feedback, or complaints about COP’s Data Ethics Policy, please email to compliance@cop.dk.

8. Policy Review, Monitoring and Approval

COP reserves the right to amend and revise the content of this policy when necessary (e.g., legislative changes, COP business changes). At a minimum, COP will initiate a review of the Data Ethics Policy every two (2) years. This policy is approved by the Executive Committee of COP A/S.

9. Policy Versions

The following table illustrates version logs and respective changes to COP's Data Ethics Policy.

Version No	Effective from	Changes	Approved by
1	December 2023	Policy initiation	Executive Committee COP A/S