



Data Governance and Data Ethics Policy

DSB



Department responsible: Data Governance, IT

Approved by: The Board of Directors

Date: 18 December 2025

1. Introduction

The use of data is an integral part of our daily work at DSB, and we strive to be fact-based and data-driven in our decisions.

The Board of Directors approves this policy once annually and in case of significant changes.

2. Purpose

The purpose of the policy is to establish DSB's approach to what constitutes good data ethics and the principles that apply to how DSB complies with applicable legislation in the area and processes data ethically, correctly and responsibly. We always use data in compliance with our corporate social responsibility and in accordance with applicable legislation. This places demands on the way we process data, including how we register, organise, analyse, maintain and use our data.

The Data Governance and Data Ethics Policy applies to the entire DSB Group, and all employees have a responsibility to ensure that the company complies with the policy. To support the implementation of the policy, DSB's Board of Strategic Data has approved Guidelines on Data Governance and Data Ethics. These guidelines specify, among other things, the data governance activities that we focus on and describe the roles that have a special responsibility for data governance activities.

3. Our ambition and targets

DSB's ambition is for good data ethics to extend beyond the regulations applying to the area and that we demonstrate corporate social responsibility in our processing of data. We require ourselves and each other to be factual in our reasoning and decisions when using data and to manage our data as an asset in the governance of DSB, i.e. carefully according to their confidentiality, integrity and availability.

We do this in order to deliver an attractive product to our customers and to run an efficient business.

The objectives supporting our ambition are as follows:

- To be accurate in our registration of data and metadata and to be careful in our processing of data in order to achieve high-quality data and ensure the validity and accuracy of the data
- Not to collect any more data than we need and not to keep data any longer than necessary
- To ensure decentralised business ownership of data with the persons who know the data best, or who are able to drive the agenda through the business organisation, and to comply with the responsibility entailed in being a local data owner
- To prioritise our efforts. We have large amounts of data in DSB, and we therefore focus on improving the quality of the data we use in our business decisions



- To classify and prioritise data according to different levels of sensitivity and confidentiality – and in that way ensure that this is reflected in the subsequent data processing in accordance with the applicable legislation
- To always process data according to applicable compliance requirements – and to seek advice and ask questions in case of doubt
- To give high priority to the protection of sensitive personal data

4. How we achieve our ambition and/or reach our targets

The CFO is responsible for data governance and data ethics at DSB and has the overall responsibility for ensuring that we have one set of figures (data) in the organisation, that we use them to make fact-based decisions and at the same time comply with our principles of good data ethics and applicable legislation in this area.

We have a Board of Strategic Data that works to achieve our ambitions in this area, among other things through supporting activities and collaboration across the DSB organisation.

Our efforts to achieve ambitions and reach targets is based on our principles of good data ethics:

- **Authority:** We do not use customer, employee or business partner data without authority.
- **Transparency:** When we collect data, we undertake to ensure transparency with respect to the subsequent use of data.
- **Confidentiality:** We protect the personal data of individuals so that they do not fall into the wrong hands.
- **Intention:** We never collect data unless the purpose is clear – and we always only collect the data required for the purpose.
- **Unintended results:** We always carefully consider the possibility of unintended results (e.g. unintended discrimination) when collecting and analysing data.
- **Use of algorithms:** We pay particular attention to the ethical challenges that may arise from the use of machine learning and algorithms – and we strive to avoid any intentional or unintended bias in training, code and feedback.

5. Organisation, responsibility and approval

The Board of Directors of DSB has overall responsibility for approving the policy. The CFO is the executive officer responsible for the policy.

6. Interaction with other policies and guidelines

- [Compliance Policy](#)
- [Information Security Policy](#)
- [Data Protection Policy](#)
- [Code of Conduct on information security](#)
- [Processing of personal data](#)
- [Code of Conduct](#)



- [Sharing of commercial data](#)
- [Compliance Guidelines](#)
- [Data Governance and Data Ethics Guidelines](#)