



Data Protection Policy

DSB



Department responsible: Executive Vice President, Procurement & Legal Affairs

Approved by: The Executive Team

Date: 28 October 2025

1. Introduction

As a company, DSB processes personal data (e.g. names, addresses, telephone lists, passwords, civil registration (CPR) numbers, employee numbers, customer information, etc.) about employees, suppliers and customers (the 'Data Subject') and is therefore obliged to comply with legislation for the protection of personal data.

2. Purpose

When we process personal data at DSB, we must take proper care of these data. This applies when employees use their PCs, mobile phones or tablets as well as to physical documents containing personal data.

3. Our ambition and targets

DSB's ambition is to give high priority to the protection of personal data and to ensure that everyone can rest assured that personal data collected and processed by DSB are protected in accordance with the data protection legislation in force from time to time.

4. How we achieve our ambition

To support our ambition, DPO & Compliance is working with, for example:

- Annual controls in selected business lines
- E-learning about GDPR, which is mandatory for all employees
- Annual awareness campaigns on relevant data protection issues
- Preparation of risk assessments and impact assessments where necessary
- Ongoing provision of advice to the business on compliance with data protection rules

4.1. Impacts, risks and opportunities

To ensure that we process personal data in accordance with data protection rules, we are obliged to oversee that:

- There is an objective and legitimate purpose for processing any personal data collected
- There is a legal basis for the processing of personal data, for example in the form of consent, a legal obligation or obligations in connection with the performance of a contract
- The data subject receives sufficient information about his or her rights, right of access, etc.
- The personal data collected are correct, required in order to fulfil the purpose and are not stored for longer than necessary
- It can be documented that we comply with the provisions of legislation for the protection of personal data
- Data processing agreements are entered into with suppliers processing personal data on behalf of DSB
- Data will only be disclosed to third parties within the framework of the legislation for the protection of personal data



Once a year, the DPO prepares a report for the management on DSB's compliance with the data protection rules.

5. Organisation, responsibility and approval

The Data Protection Policy covers all employees of DSB and all wholly-owned companies, including managers, employees, temporary workers and contractors working at DSB.

DPO & Compliance is responsible for reviewing the policy and verifying compliance with the policy and for guiding and advising the business on compliance with the policy.

The Executive Team is ultimately responsible for personal data security at DSB and has the overall responsibility for ensuring that our personal data security management system is efficient and continuously developed.

The Executive Team of DSB has the overall responsibility for approving the policy.

The Executive Vice President, Procurement & Legal Affairs is the owner of the policy.

This policy is reviewed once annually to ensure effective protection of personal data.

6. Interaction with other policies and guidelines

- Compliance Policy
- Data Governance and Data Ethics Policy
- Corporate Social Responsibility Policy