

PHLIT Data Ethics Policy

1 Introduction

This document outlines PHLIT's stance on data ethics.

Data ethics encompasses the moral considerations that our company must address when utilizing data and new technologies.

Our commitment to data ethics extends beyond mere legal compliance. While we adhere to all regulatory requirements, we recognize and respect that our data usage (both personal and non-personal) might introduce risks not covered by existing laws. We mitigate these risks by following the principles detailed below.

2 Sources of data

PHLIT processes a variety of data types, including:

- Personal data of job applicants, employees, users of our digital services, and business associates
- Non-personal data related to our operational assets and activities

We aim to uphold high standards of data ethics for both personal and non-personal data usage.

3 Use of technologies

We employ a range of software products in our data processing activities.

4 Data ethics principles

We adhere to the following principles of data ethics:

4.1 Transparency and openness

We commit to transparency and openness in our data usage. Our data ethics principles are designed to be clear, understandable, and easily accessible.

4.2 Use of data

Data is a vital asset for our business. We maintain rigorous standards for data collection and utilization:

- We set high standards for ourselves in collecting data from our assets and other sources.
- We impose strict requirements on our partners from whom we receive data, encouraging them to establish their own data ethics principles.
- We avoid extensive data collection practices that could be considered data-driven surveillance.

4.3 Accountability

Since data collection involves human decision-making, we strive to implement mechanisms that control the context of data collection, the systems used for data processing, and the methods to ensure data quality.

We recognize that data and systems can be misused or used for unintended purposes. We assess and document acceptable uses of our data and systems and take measures to prevent impermissible uses.

4.4 Processes and policies

As needed, we will develop additional policies and procedures to ensure compliance with the aforementioned principles.

5 Approval

This policy was approved by the CEO of PHLIT ApS on 30th July 2024.