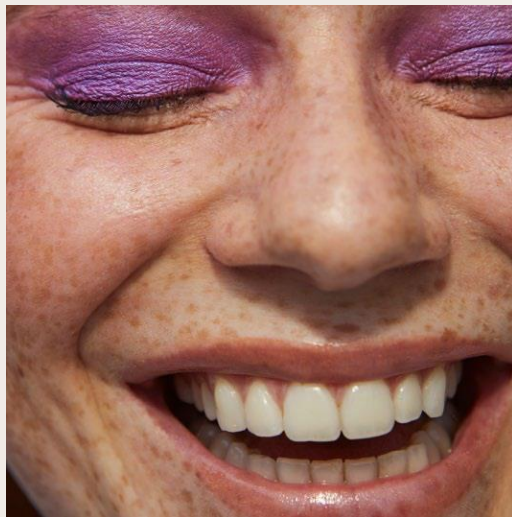


**M A T A S**

## Data Ethics Policy



**G R O U P**

## 1. Introduction

For Matas Group, it is crucial that our customers, employees, and other stakeholders can feel confident that Matas Group processes their data according to careful ethical considerations and with an always high focus on security. Our ethical considerations in connection with responsible use of data and new technologies is how we define data ethics.

It is Matas Group's stated goal that data from our customers, employees and other stakeholders must never be used for purposes that the individual does not agree with and is not fully informed about, and that there shall always be full transparency for the individual, including as to how a person can manage his or her own data. At Matas Group, everyone must experience that their data is treated with respect, and that we as an organisation make the ethically correct choices, regardless of whether the legislation allows something else or something more.

As part of Matas Group's work to ensure security for all stakeholders in relation to the data we process, we have prepared this Data Ethics Policy, which describes how we work with data ethical questions. This Data Ethics Policy in its most recent form is available on [matasgroup.com](https://matasgroup.com) together with our other policies for, among other things, Social Responsibility, Human Rights and Diversity. A description of how we specifically process personal information regarding our customers and loyalty club members can be found on our respective brand sites (a.o. [matas.dk](https://matas.dk) and [kicks.se](https://kicks.se)). Our Employee Privacy Policy is handed out to every employee and is available in our internal channels.

## 2. Governance when working with data ethics in Matas Group

The Board of Directors is responsible for approving and supervising compliance with Matas Group's Data Ethics Policy, and the Audit Committee assesses the Policy's suitability, adequacy and effectiveness at least annually.

The operational responsibility for working with data ethics in Matas Group is anchored in Matas' Group's Data Ethics Committee (hereinafter MGDEC), which consists of leading figures within IT, ESG, HR & Organisation, Communication, Loyalty, E-commerce and Legal. The committee is chaired by the representative of Legal and reports to Matas Group's Executive Committee. MGDEC meets every quarter or when necessary to discuss the work with data ethics and decide on new ways of processing data, specific cases and questions from the organisation and the outside world.

MGDEC is responsible for ensuring that our daily work always reflects the principles of this Policy, and that our data ethics work is based on the recommendations from the Danish **Expert Group on Data Ethics**<sup>1</sup> from November 2018, which will ensure that we use data according to the following criteria:

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<sup>1</sup> In March 2018, the Danish Expert Group on Data Ethics was appointed by the Danish government to, among other things, prepare data ethics recommendations and look at how responsible use of data can become a competitive advantage for Danish companies.



These criteria are the foundation for Matas Group's processing of all data, regardless of who the data relates to (employees, customers, or partners) and are reflected in the way we process personal data including loyalty club membership data and in our focus on security as described below.

This Data Ethics Policy is handed out to all employees upon employment. Our employees also undergo ongoing training in the safe and correct processing of personal information. Questions regarding data ethics as well as reports of violations of the Data Ethics Policy can be directed to [dataetik@matas.dk](mailto:dataetik@matas.dk), or anonymously via our Whistleblower schemes [here](#).

### 3. Data sharing and processing of loyalty club member data

The use of new technologies and considerations on data ethics are particularly relevant to our work with our loyalty clubs (Club Matas and KICKS Club) due to the amount of data and the level of detail. We have around 6 million loyalty club members, which places us among the largest providers of loyalty programmes in the countries where we operate. Our customers' data is a valuable and fragile resource, which we have both ethical and legal obligation to protect as best we can.

Via our loyalty programmes, we collect data from members, both when registering and when they use their membership to buy or search for items on our platforms. It is basic information such as contact information, gender, and age, stated interests within our product range, behavior on our platforms and purchase history. The purpose is for members to get the most out of their membership by targeting our communications to the members and providing them with better and more relevant offers based on their data, purchase history and behavior on our platforms.

Our loyalty clubs are founded on the decision that we do not use personal data of the members for resale, just as we do not buy or otherwise engage in any commercial collection of personal data about our members from third parties.

#### **4. AI technologies in Matas Group**

In a world where technology is constantly developing, it is important to have clear guidelines for the use of advanced technologies such as generative AI and ChatGPT. These guidelines are not only important to ensure efficient and safe use of the technologies, but also to protect our data and our reputation. We have therefore established internal guidelines for the use of generative AI such as ChatGPT, which we continuously update as the technological possibilities develop.

##### **Using external models:**

We provide safe systems for using Large Language Model (LLM) technology to HQ employees in Matas Group via our internal LLM solution MAIA - to ensure that our staff can safely use AI technology, minimising risk of sharing personal and commercially sensitive data.

##### **Creating models:**

When we use new AI technology in solutions aimed at our customers, it is only done according to prior data ethical considerations and the principles of this policy.

Before we take new AI technological solutions into use, we create internal rules and minimise the use of data that could be sensitive in terms of discrimination, diversity, and appropriateness.

#### **5. Security**

Matas Group operates a security policy with strict management of access rights that ensures that only specially designated persons have access to specific data about individuals. To prevent accidental access to data or outright cyber attacks, we always use the latest network security technologies, 2 factor validation of privileged remote access as well as a large segmentation of the network. The entire infrastructure is monitored 24/7 by an external Security Operations Center (SOC), which monitors and correlates incidents in the network related to the security around systems and data.

In addition, we use independent external security companies that continuously perform penetration tests from external touch points towards our network in order to verify that the implemented security systems work as intended.

#### **6. Availability of own data and deletion**

Our customers, employees and other stakeholders can always request insight into what personal information we have processed about the person in question and ask to have it corrected or deleted if it is incorrect, incomplete, or irrelevant.

We have implemented deletion routines to secure that we do not retain information longer than necessary for the collaboration, regardless of whether you are a customer or an employee. Our deletion routines are described in our various privacy policies for club member, customers, and employees.

Approved by the Board of Directors of Matas A/S on 14 November 2024.

M A T A S

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