

Data Ethics Policy

Data Ethics Policy

The purpose of this Data Ethics Policy (“policy”) is to outline the ethical principles by which ALK processes data and thus articulate our values making the principles more visible to our patients, customers, employees, business partners and other stakeholders.

Our approach to data ethics

As a pharmaceutical company, we process data in several different ways; in clinical trials, within research and development, Human Resources, customer interactions including pharmacovigilance and more.

This entails a great responsibility to ensure data fairness, transparency, security, and integrity.

The term “data” covers data of all types and from all sources, including publicly available data, such as statistical and research data, financial and corporate data, data collected from individuals, and data derived from other sources.

Our Data Ethics Principles

Our Data Ethics Principles are in line with our approach to business ethics, outlined in our Code of Conduct, Data Protection Policy and grounded in our Cultural Beliefs. The principles reflect individual data control, transparency, accountability and equality and cover all types of data from individuals processed by ALK. We commit to:

- Following applicable laws, regulations and guidelines related to data ethics
- Respecting people’s privacy, protecting their rights and honouring confidentiality
- Ensuring that economic benefits of our work with data does not outweigh ethical considerations
- Sharing data with partners and healthcare professionals responsibly protecting individual’s rights
- Using algorithms, predictive modelling and technologies such as artificial intelligence in ways that strive to avoid potential bias
- Applying our Data Ethics Principles in the absence of formal legal requirements

Governance

This policy is assessed by the Board of Directors regularly, and it applies to all ALK employees. Daily management of data ethics is carried out by relevant business units, who have integrated these principles in the way they work. ALK commits to mitigating risks and resolving grievances, through our internal procedures or, if relevant, in collaboration with stakeholders.

Approved by the Board of Directors on 9 December 2021.

