

# Data Ethics Policy

## 1. PURPOSE

This policy describes our data ethics and the principles that govern how Birch Ejendomme Holding ApS and all subsidiaries ("Birch Ejendomme") collects, processes, uses, shares and deletes data ethically, responsibly and transparently.

Our data ethics policy aims to clarify how Birch Ejendomme works with data ethics and data use, and to set a framework for the data ethical behaviour that Birch Ejendomme strives for in further digitalisation. The policy shall support and complement Birch Ejendomme's privacy policies and Supplier Code of Conduct.

## 2. BACKGROUND INFORMATION

On 1 January 2021, legislation came into force for large and listed companies in Denmark to report on data ethics. The purpose of the legislation is to provide transparency on how companies work ethically with data and encourage companies to take responsibility for how they handle personal data.

## 3. HOW TO USE

Birch Ejendomme is increasingly processing more and more data in line with the increasing digitalisation of the industry. Birch Ejendomme's Data Ethics Policy is therefore not limited to the processing of personal data, but in principle covers all types of data processed. This policy is group-wide for all companies in the Birch Ejendomme group and is binding for all employees.

## 4. PRINCIPLES FOR DATA ETHICAL PROCESSING

Birch Ejendomme is committed to being aware of its social responsibility and works purposefully to mature and drive the property development and rental industry in a responsible direction. The guiding principles for data ethics, as described below, set the ethical standard for the use of data within Birch Ejendomme and are based on the Charter of Fundamental Rights of the European Union.

### 4.1. Self-determination

Human self-determination must be a priority in all forms of data processing. In Birch Ejendomme's work with ethically correct processing of data, our starting point will always be that the data that tenants, employees and other individuals (collectively referred to as the "Individuals") hand over to us is the Individuals' own. This ensures the best self-determination for the Individuals.

*Data management should be transparent and user-centric with the highest amount of control for the Individuals.*

### 4.2. Privacy policies

Processing of data is carried out with respect for the privacy of the Individuals and under the protection of personal data. Birch Ejendomme processes personal data in accordance with our privacy policies and only collects and processes personal data that is necessary to fulfil the purpose of the processing.

Personal data must be processed in ways that are consistent with the intentions, expectations and understanding of the providing party. For example, personal data must not be processed for new purposes that are incompatible with the purposes for which the personal data was originally collected.

*Data processing must respect the Individuals' privacy and comply with data protection legislation.*

### 4.3. Human dignity

Birch Ejendomme will always ensure the dignity of the Individuals by not using data against the Individuals' own

interests, and we will continuously ensure good data protection against leaks and misuse, e.g. by following best market practices for use of technologies and encryption methods and through organisational processes.

*Data processing must be secure and safeguard the Individuals against abuse through integrity of data processing.*

#### 4.4. Accountability

Accountability is exercising due diligence when using new technology and sharing data with third parties. Everyone at Birch Ejendomme must contribute to responsible and ethical data processing. Therefore, we work systematically with our processing of data in relation to data collection, data processing, risk assessments and deletion.

An adequate level of security must be implemented in and around the technologies used to process data. The security measures must include technical as well as organisational measures, and the necessary level of security must be determined based on a risk assessment of the specific processing activity and the technology used to process data.

To a limited extent, Birch Ejendomme uses software that can be classified as artificial intelligence (AI). However, we expect that AI in the form of advanced data analysis, including, for example, "big data" analyses, the use of AI or algorithms for automated decision-making, or other data usage, will become a more integral part of our business activities in the coming years. Therefore, we have prepared an AI policy that covers how AI can be used at Birch Ejendomme in a responsible way and in accordance with applicable legislation.

*Data processing must support accountability. It must be documented, risk assessed and complied with at all stages, including contractually with third parties, with the data subject in mind.*

#### 4.5. Equality and diversity

When designing data systems, including, for example customer platforms, in Birch Ejendomme, we ensure that everyone, demographically as well as geographically, can safely use Birch Ejendomme's systems so that the system design does not exclude users in any way, internally or externally.

*Data processing should support equality and diversity.*

### **5. APPROVAL, RESPONSIBILITY AND CONTACT INFORMATION**

This Policy was approved by the board of directors of Birch Ejendomme Holding ApS on 3 December 2025.

The daily work with data ethics takes place within Birch Ejendomme's relevant business areas.

Birch Ejendomme's executive management team is responsible for drafting and updating this policy. The management continuously assesses - at least once a year - whether the policy needs to be updated. Birch Ejendomme's legal department reports significant risks and breaches of the policy to Birch Ejendomme's executive management board.

Any breaches of this policy or any questions to this policy can be sent to Birch Ejendomme's Chief Legal Officer at [compliance@birchgm.dk](mailto:compliance@birchgm.dk)