

DONKEY REPUBLIC

Data Ethics Policy

Version no. 2 2024

Adopted by the board of directors on

March 2024

Introduction

This Data Ethics Policy establishes Donkey Republic's commitment to data ethics, emphasizing the responsible use of data. The policy applies to all forms of data, including personal and non-personal data, and outlines Donkey Republic's approach to ensuring ethical data practices.

Overview

Donkey Republic processes data through its software-as-a-service (SaaS) solutions and bike sharing system, as well as through the supporting processes within the organisation. Various types of data are being processed of both personal and non-personal nature.

- Personal data, such as contact details, as well as other customer information.
- Non-personal data relates to the operational aspects of the organisation.

Regardless of the nature of data, Donkey Republic is committed to treat data with due care and respect.

Purpose

The purpose of this policy is to outline Donkey Republic's commitment to protect the data processed within the organisation, as well as to continuously ensure the integrity and availability of the data. This policy is pursuant to section 99d of the Danish Financial Statements Act.

Scope

This policy covers the activities of Donkey Republic A/S, both technical and organisational. The technical solutions shall be implemented in line with this and other applicable internal



policies. All employees must act in accordance with this policy to ensure that data ethics is inherent in all decision-making within Donkey Republic.

Data ethics principles

Donkey Republic is committed to the following data ethics principles:

Respectful use of data

Ensure that all Donkey Republic employees possess a high level of awareness regarding the appropriate processing of data. This includes adhering to best practices in data security, complying with applicable legislation, and making conscious decisions aligned with Donkey Republic's values. The data we process includes personal data related to job applicants, employees, users of our digital services, and business relationships, as well as non-personal data related to various organizational functions, such as Product, Sales & Marketing, People & Culture, Legal, and Finance.

Appropriate processes and controls

To appropriately process and protect the substantial volume of data within the organization, clear processes and controls must be in place. Adequate security measures, including technical and organizational measures, shall be implemented based on risk assessments specific to each processing activity and the technology employed for personal data processing.

Transparency and collaboration

As a provider of SaaS solutions, Donkey Republic values transparency and collaboration. As a processor of sensitive data from customers, employees, and business relationships, we recognize the importance of building trust among stakeholders. We commit to being transparent, collaborating with stakeholders, and implementing mechanisms to control data collection contexts, processing systems, and data quality assurance.

Safety Measures

- Safeguarding confidential information and keeping it within company premises unless necessary to move.
- Responsible sharing of personal data, including names, emails, phone numbers, and customer IP addresses in internal communication channels.
- Access to customer data tools is limited to relevant teams/colleagues.

- An automated user deletion process is in place.
- 2-Step verification is enforced for relevant software accounts.
- Breach notification procedures are in place.
- Avoidance of unnecessary transfers of sensitive data outside the organization.
- Sharing confidential data over the company network/system, avoiding public Wi-Fi.
- Ensuring authorised recipients and compliance with their security policies.
- Reporting scams, privacy breaches, and hacking attempts.

Training of employees

We commit to designing, implementing and upholding internal processes and controls that support not only needs of the organisation but also best support all employees in their activities while adhering to the respectful treatment of data. This includes annual mandatory awareness training for all employees, at which processes and mandatory guidelines that are already in effect are being presented e.g. appropriate management of user rights and access restrictions.

Monitoring and control

This Policy has been approved by Donkey Republic's board of directors and adherence to the principles will be monitored at regular intervals. The Executive Management is responsible for establishing policies, processes and procedures to ensure compliance with this Policy, and reporting structures are put in place to verify compliance.

This Data Ethics Policy has been reviewed by Donkey Republic Board in March 2024 and it will be reviewed on an annual basis. The policy will be available on the Company's website at: <https://invest.donkey.bike/esg/>



Signatures

Executive Board

Niels Henrik Rasmussen
Chief Executive Officer

Christian Dufft
Chief Financial Officer

Board of Directors

Caroline Søbørg Ahlefeldt-Laurvig-Bille
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Laurent Mercat

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