

# Data Ethics Policy

Lundbeck is a global company engaged in the research, development, manufacturing, and commercialization of pharmaceuticals across the world. We are 5,600 people in +50 countries.

We process data for well-defined purposes that ultimately aim to improve the lives of patients. We comply with all applicable data privacy laws and regulations and have implemented rigorous controls to ensure adherence with our Data Privacy Policy and Procedures.

This Data Ethics Policy adds to these controls and is particularly relevant in the design and application of digital technologies. It also applies to the processing of non-personal data e.g. production and market data.

The policy is intended to guide ethical and responsible decisions on our use of data for maximal benefit and minimal harm for individuals and society.

## Data Ethics principles

With this policy we incorporate our commitment to the principles of ethical data use from the International Federation of Pharmaceutical Manufactures & Associations (IFPMA):

1. **Autonomy:** Respect individuals' privacy, protect their rights and honour confidentiality.

Data should be collected and used in ways that are consistent with the intentions and understanding of the individual. Best efforts should be made to make individuals aware of how their data will be used and, where appropriate and possible, offer them choices about who has access to their data and how it may be used.

2. **Transparency:** Individuals should be able to understand how their personal data are used.

Individuals should be informed in an appropriate and understandable manner regarding the type and extent of data collected about them; how it will be used; how technologies are used to aid decisions that impact them; how their rights are protected; and what actions they may take to exercise their rights. Legally permissible limitations on such rights should be clearly explained. Data governance standards and practices should be made available for public review, when appropriate.

3. **Data quality:** The best quality data available should be used to make decisions.

Data use should include processes to identify, prevent, and off-set poor quality, incomplete or inaccurate data. When data quality, completeness or accuracy presents risks of bias or harm to the individual, processes for mitigating these risks should be pursued and documented.

4. **Fairness and non-discrimination:** Data acquisition should be inclusive, equitable, and seek to support the industry's mission of responding to the needs of all patients.

Engaging a diverse set of stakeholders in decision-making around data use and development of technologies to leverage data can build trust and support efforts to eliminate harmful biases. Technologies leveraging data should also include data-driven processes for quantifying the potential for bias in the populations in which they are being deployed.

5. **Ethics by design:** Controls to prevent harm and risks to individuals should be built into the design of data architecture and data processing.

This includes having processes in place to identify, assess, and mitigate risks of intentional and unintentional discrimination and bias, breaches in privacy and security, physical harm and other adverse impacts on individuals. Protecting privacy also includes applying strong cybersecurity standards and appropriately preparing the data for use (e.g. through use of anonymization and pseudonymization techniques where relevant and appropriate) and restricting re-identification of pseudonymized data without permission.

6. **Responsible data sharing:** Data sharing should be based on processes that actively and consistently consider, prioritize and protect individual rights.

7. Data should always be obtained by legitimate means and there should be designated individuals accountable for safeguarding the data and ensuring confidentiality. Third parties working with Lundbeck should be informed about and expected to adhere to these principles. In addition, data interoperability initiatives should prioritize, include and support ethical and responsible data sharing practices.

8. **Responsibility and Accountability:** These principles are operationalized through effective governance, clear standards, training, monitoring activities and disciplinary sanctions.

Senior management is made aware and should ensure the application of the ethical principles in decisions regarding the use of data in strategic activities.

Ethical aspects of new digital data processing technologies are assessed in consultation with Lundbeck's specialists within data privacy and ethics. This includes considering stakeholder expectations and current understanding of the risks and benefits to individuals of the data use.

Lundbeck will routinely monitor compliance and assess the effectiveness of the current policy as part of our Code of Conduct Compliance Programme.