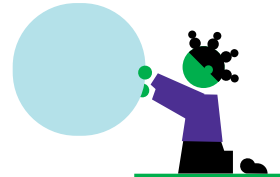


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Approved by LFELT

Approval date December 2021

Data Ethics Policy



Data Ethics Policy

Objectives

In the LEGO Foundation data ethics is a shared responsibility across the organization. In light thereof, we have implemented the following data ethics policy to ensure that data is always treated and used in an ethical way in the LEGO Foundation, and to ensure that we have set out guiding principles for future undertakings.

Employee and Candidate Data

The LEGO Foundation has internal policies governing the collection and use of employee data to ensure that such data is handled in accordance with relevant legislation, and necessary controls have been implemented to ensure compliance. All candidates and employees are informed of any processing of their personal data by way of privacy policies.

To ensure that data is not processed in an unethical way, all employees receive awareness training in compliant processing of personal data and all purposes that involve processing of employee and candidate data must be approved by the head of the HR department.

Data from our projects and collaborations

The LEGO Foundation believes that collection and analysis of data from our projects can be a valuable resource to develop and establish innovative learning through play. The LEGO Foundation commits to ensure that use of such data happens in a safe and fully transparent way, to ultimately systemically reaching children with learning through play.

The LEGO Foundation strives to make the "LEGO Fonden Code of Conduct" part of all partnership agreements and service agreement. In the code of conduct the LEGO Foundation stipulates that suppliers and partners must have a policy for ethical use of data or that they strive to live up to the same principles as set forth in this data ethics policy.

Sourcing of Data

The LEGO Foundation only sources external data if necessary and for a legitimate purpose, and limits data to what is necessary for the fulfillment of such purpose. The LEGO Foundation only collects data from trustworthy sources.

When sourcing external data related to employees and candidates we do so in full transparency, and the employees or candidates always have the possibility to make use of their rights in relation to the GDPR. The LEGO Foundation does not sell data to third parties.

Non-Personal Data

The LEGO Foundation processes non-personal data to conduct day to day operations

The LEGO Foundation commits itself not to use data in a harmful and unethical way, but to promote the use of data in a good and respectful way.

New Technology

The LEGO Foundation acknowledges that technology is a highly important part of the play experience of the future and the present.

Use of or investments into new technology within the LEGO Foundation is subject to approval by the Leadership Team to ensure that the use of or investments in new technology are responsible and ethical.

Bias in Data

Data can be biased, and the LEGO Foundation does, therefore, not make decisions involving individuals based solely on data. This is to ensure that decisions undergo a human evaluation with the possibility for dialogue with the individual in concern.

The LEGO Foundation promotes a balanced use of data and strives to remove bias and strictly forbids the usage of data in any way that will promote bias.

Awareness

To ensure the best care and ethical use of data, the LEGO Foundation has incorporated policies and guidelines for working with personal data, as well as incorporated general awareness training on the use of personal data, to ensure compliance with applicable legislation.

This policy is made available to the employees via the internal and external websites, and it is part of the mandatory onboarding procedure.

Whistleblower Line

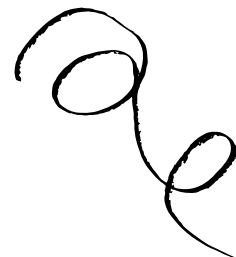
The LEGO Foundation prioritizes transparency and has implemented a Whistleblower Line to ensure that all employees have the possibility to anonymously voice any concerns – also relating to the use of their data.

The same Whistleblower line is also available to the public and can therefore be used to raise attention to concerns relating to conduct or investments that are detrimental to this policy.

Governance

The LEGO Foundation has decided that the Extended Leadership Team is the approving authority for activities relating to this policy.

The LEGO Foundation also commits itself to use its influence to ensure ethical use of data where applicable.

A handwritten signature or scribble in black ink, consisting of several loops and a trailing line, located in the bottom right corner of the page.