



Data Ethics Policy

Universal Robots A/S

1. Preamble

As part of our business Universal Robots A/S ("**Universal Robots**") processes different categories of personal data. Universal Robots takes the processing of personal data very seriously, and we take pride in processing all personal data with a profound respect for the data subjects, whether they are employees, customers, business partners, or other third parties.

Universal Robots is very conscious of our responsibilities and obligations with regards to data privacy and data protection, and Universal Robots has procedures in place to ensure that Universal Robots always receives, collects, handles, analyzes or otherwise uses personal data ethically correct and in compliance with both Danish and the EU law on data privacy and data protection. We acknowledge that the rapid pace of technological development and the increase in use of large quantities of data involve greater risks for the data subjects and thus require great thoughtfulness when dealing with personal data. Consequently, Universal Robots works actively to address data ethical issues in both our day-to-day business and our overall business strategy.

This Data Ethics Policy ("**Policy**") sets out the framework for the overall management of personal data from an ethical perspective and our general data ethic principles. The scope of this Policy is to describe our overall approach to ethical data processing covering all data types, including also non-identifiable data. The Policy is supplemented by Universal Robots' [Privacy Policy](#), the [Cookie Policy](#) as well as our internal HR policies for data protection and IT Security Policy.

2. Data Processing

Universal Robots exclusively collects and processes personal data for specified explicit and legitimate purposes relevant for our business. A thorough overview of the data subjects and purposes is available in our [Privacy Policy](#).

Universal Robots does not process personal data using advanced technologies such as AI, algorithms, or machine learning.

Universal Robots only disclose personal data to third parties when absolutely necessary to comply with legal obligations or the purpose for which the personal data initially was collected.

Finally, Universal Robots goes to great lengths to ensure a high level of security, including but not limited to encryption, backups, effective firewalls, access limitation, employee awareness training and strict retention policies.

3. Principles and Methods

It is of great importance for us to ensure that our customers, suppliers, employees, and other business partners feel safe when entrusting us with their personal data. Our processing of personal data is therefore anchored in the following key principles.

- 1) *Transparency*. Universal Robots requires full transparency regarding our processing activities to ensure that our business partners, customers, employees, and other data subjects always know why and how Universal Robots processes their personal data.
- 2) *Respect*. Universal Robots has a great respect for the data subjects and the personal data they have entrusted us with, and Universal Robots takes the privacy of the data subjects very seriously. Universal Robots continually reevaluates our processing activities and always assesses whether less extensive processing is possible.

- 3) *Accountability*. Universal Robots always takes full responsibility for security of the personal data we process. Safety procedures and measures are in place to mitigate security incidents, and Universal Robots always acts with great consideration for the consequences for the data subjects.
- 4) *Equality and Justice*. The technologies Universal Robots uses and the purposes for which Universal Robots processes personal data is non-discriminatory. Universal Robots will always make sure to avoid bias when designing and using technologies or processing personal data in general.
- 5) *Limited Disclosure*. Universal Robots does not sell personal data or otherwise profit on disclosure of personal data. Universal Robots does not disclose personal data to third parties unless the disclosure is necessary for to comply with legal obligations or the purpose for which the personal data initially was collected.

4. Organization and Evaluation

Our data ethics initiatives and the overall responsibility regarding our processing of personal data, including implementation of new technologies as well as the use of personal data are monitored by our Global Data Protection Team.

Universal Robots ensures that our employees are always well-informed about data ethics, data security and data privacy and prepared to handle personal data with the appropriate respect, transparency and confidentiality. This Policy is an integrated part of our data privacy awareness training.

This Policy is approved by our executive management and will periodically be reviewed and revised whenever new technologies or principles are applied to our processing of personal data or if relevant data privacy regulations require us to do so.