Policy	Document Owner	Approved by Date	Review date	Effective date	Version	Language	Page
	Frédéric Antoine Serval	Orlando Machado 10/31/2022	10/31/2022	11/1/2022	1.0	English	1
Title	Statement of Data Ethics						
Location	Covers all legal entities						

Basis of Preparation

The statutory report on data ethics is prepared in accordance with section 99d of the Danish Financial Statement Act.

The report covers the period 1 January to 31 December 2022.

Statement of Data Ethics

Positive and responsible use of data

Purpose

Here at the LEGO Group, we recognise the opportunities data gives us to continually learn, innovate and create. And we understand it is our responsibility to use data with care and as a force for good.

As the world becomes increasingly data driven, it is essential that we work with data ethically and have a clear point of view on why we collect it, store it and how we use it. We have created this set of data ethics principles to make sure we use data responsibly to support our mission 'to inspire and develop the builders of tomorrow'.

Scope

The policy applies to LEGO A/S and its subsidiaries.

Requirements

The data ethics principles and framework aim to help solve ethical dilemmas.
The framework is meant to be used as a guidance for employees at the LEGO Group to leverage in their decision-making process whenever they face an ethical question or challenge.

Roles and responsibilities

- The overall responsibility for the Data Ethics Principles in this policy rests with the Chief Data Officer (CDO).
- People leaders and employees – responsible for upholding LEGO values, principles and policies in own organisation and daily work.

The LEGO Group Data Ethics Principles

Our Data Ethics principles outline our belief that the use of data must be positive, fair, clear and responsible.

These principles show we care deeply about meeting legal data requirements and reflect our commitment to the ethical use of data for positive impact on society.

POSITIVE:

We believe that using data in an ethical, transparent, and conscientious way can be a positive force for our consumers and our company. Through the responsible use of data, we can create greater opportunities to learn and innovate to inspire and develop the builders of tomorrow.

- we use data to be a force for good and to help us meet our Play, People, Partner and Planet promises.
- data fuels innovation to develop learning-through-play experiences that support the development of 21st century skills.
- we use data responsibly to develop insights that help people make better decisions and to deliver improved and valuable experiences.

FAIR:

Data is more than just facts and figures. Data creates insight and ideas that have an impact on people and society. For that reason, we take a human centric approach to the use of data, and we are committed to the protection of every individual through the fair use of data.

- we believe data should be used to create a valuable impact on the world that we live in and to create better opportunities for everyone.
- we continually strive to minimise bias in data and to increase diversity and non-discrimination through the use of data.
- we only collect data that's intended for a specific purpose, and we aim to minimise the processing of personal data.

CLEAR:

Data can be complex, but the way we talk about it is not. It should be easy to understand, clear and explainable. Because if we all talk about data in a way that everyone can understand, including children, then people are empowered to make better choices and better decisions.

- We aim to make it simple to understand how data is used and the value it will deliver.
- We give people choice and control over how their data is used with clear consent processes that are flexible and optional.
- We are committed to clearly documenting our process for data collection and application and will make sure our use of Artificial Intelligence is easy to explain.

RESPONSIBLE:

At the LEGO Group trust is of the greatest importance. This includes trust in the use of data and so we take the safety of data very seriously. This applies to all data that we use and especially for personal data. Our colleagues are responsible data citizens with guidelines in place to control the way data is collected, stored, processed and applied.

- we stay up to date with global data legislation standards and invest in technology to protect all data.
- security and privacy focused design processes are integral to our development of solutions that use and manage data to ensure we provide safe digital products.
- we work with our partners to understand and guide how they manage and use data responsibly.

Data Ethics in Practice

In the LEGO Group we believe that data ethics matters, and that is a mindset for all of us to apply in daily jobs. Therefore, in 2022 initiatives were run to make the high-level principles operational and applicable to the organisation. A dedicated team collaborated with relevant stakeholders in the organisation to develop a simple and useful framework which can be applied across projects. This framework has been tested with a pilot project and will be treated as an iterative process with focus on test, learn and adapt to make it useful for the wider organization.
Additionally, to drive awareness, we have developed internal communication for all colleagues and hired a data ethicist to the team responsible for operationalizing the data ethics principles.

Revision History

Version	Modifications	Modified by
1.0	First publication	Ellis Didriksen