



# Data Ethics Policy



## 1 Introduction and Purpose

This Data Ethics Policy (the “Policy”) has been adopted by the Board of Directors of RTX A/S. The policy applies to all entities and employees within the RTX Group (“RTX”) and covers all data processing at RTX.

The digital development occurs at a high and increasing pace. Given this development, RTX has specified our approach to data ethics to guide our use of data and new technologies. Therefore, the purpose of the Policy is to describe the principles under which RTX works with ethical use of data and new technology as well as to raise awareness of our data ethical principles. Data ethics goes beyond regulatory requirements and with this policy RTX wishes to commit us to a high standard for how data is processed and used.

## 2 Data Used and Processed

RTX uses data related to employees, customers, suppliers, and visitors to our website and it includes both personal and non-personal data. Data related to employees are internal data for administrative purposes. Data related to customers and suppliers are data necessary for making and receiving payments as well as the contractual basis for the relationship. Additionally, we offer our customers data tools that can be used to deploy and manage the devices they acquire from RTX - any use of such tools will be based on dedicated agreements which also covers data processing.

The collection of data from our website is mainly for statistical purposes in order to assess usage of the various parts of the website. Such data may be collected directly or via a third party. Where data from third parties are used, we expect that the relevant third party is legally in possession of the data and legally transfers the right to use the data to us. We further expect that the third-party focusses on data protection and displays ethically correct use of data.

## 3 Our Data Ethics Principles

### Security

We strive to maintain a high level of IT security to protect confidential information and personal data handled by RTX against unauthorized use and publication. This includes relevant access controls both toward physical and virtual data networks which are tested periodically. RTX management and employees are regularly updated on potential cyber crime threats and on how to minimize the risk of e.g. phishing and hacking. RTX has a disaster recovery plan in place for restoring critical business services.

### Transparency

We strive to display transparency and openness towards individuals so they to the extent reasonably possible has knowledge of which data we collect about them, why we collect the data and how we use the data.

## Responsibility

We consider whether any collection and processing of data is warranted and legitimate and ensure that it does not violate fundamental privacy or other rights. RTX does not sell any data to any third parties or profit from it in any other way.

## 4 Use of New Data Processing Technologies

If RTX uses new data processing technologies, such as for instance artificial intelligence and machine learning they must be designed and used with respect for the principles in this Policy and without any biases.

## 5 Roles and Responsibilities

The Board of Directors has the overall responsibility for adopting, reviewing and amending the Policy based on recommendations from the Audit Committee. The need to update the policy will be assessed annually by the Audit Committee.

Executive Management is responsible for ensuring that a Data Ethics Policy is developed and for facilitating that the principles are integrated into the daily work at RTX. On a daily basis, the data ethical principles are integrated into the daily work in the relevant areas and functions of the RTX organization (such as Commercial incl. Marketing, R&D, Supply Chain, HR & Payroll, CTO Office).

Approved by the Board of Directors of RTX A/S on 19 September 2022.