

Dear Reader

KMD has been an integral part of Denmark's public sector for more than 40 years. Our IT systems bring us into contact with thousands of Danes every single day. Almost one million Danes receive their salaries via KMD's systems, and our systems pay government benefits equivalent to more than 20% of Denmark's GDP. At the same time, we are upping the ante for IT and making life easier for thousands of users in the public and private sectors, schools, home care and healthcare.

We are in other words a cornerstone of the Danish welfare state, and our commitment to corporate social responsibility (CSR) is part of our DNA. Our CSR strategy covers four main areas: digital welfare, employees, climate & environment and supply chain.

In 2014, we focused on building partnerships and developing projects in these four areas. For us, CSR is about making an active contribution, rather than presenting a barrier, to social, economic and environmental sustainability. This is set out in our CSR policy introduced in 2011 and our CSR strategy launched in 2012. KMD will review its CSR strategy in 2015 and expects to present a revised strategy in the first half of the year.

The starting point is KMD's position as an IT company with the vision of creating digital shortcuts for customers and society. As regards CSR, this means that KMD will create digital shortcuts that contribute to a richer, safer and more sustainable society.

Our work in these four main areas is described in more detail below.

KMD first made a commitment to apply the UN Global Compact's 10 principles in 2011. We are proud and pleased to uphold this commitment and supported the Global Compact with a donation of USD 5,000 in 2014.

The Global Compact provides KMD with a general framework for its CSR work. This work is coordinated by the Company's CSR Board, chaired by the CEO and otherwise comprising the Senior Vice Presidents for Citizen Centered Software Solutions, Legal & Business Support, HR & Facility Management and Communication & Marketing. The CSR Board issues guidelines for the Company's CSR efforts, and monitors and ensures progress on the targets set for the various focus areas. In addition, KMD's works council serves as a reference group for the development of CSR work.

KMD considers its overall CSR efforts to be satisfactory.

Best wishes

Eva Berneke
CEO, KMD A/S

STATUTORY REPORT

This report constitutes the statutory report on corporate social responsibility for KMD A/S pursuant to section 99a of the Danish Financial Statements Act. The report provides an overview of KMD's work as a socially responsible business. Further information about KMD's CSR efforts can be found on its website at www.kmd.dk/csr. However, that additional information does not form part of the Company's reporting pursuant to section 99a.

FN'S GLOBAL COMPACT PRINCIPLES	STRATEGIC CSR FOCUS AREAS FOR KMD			
	DIGITAL WELFARE	EMPLOYEES	CLIMATE & ENVIRONMENT	SUPPLY CHAIN
PRINCIPLE 1: Businesses should support and respect the protection of internationally proclaimed human rights.	<p>Article 19 _Partnership with the Danish Lung Association, p. 31 _KMD Analyse provides fertile ground for debate, p. 31</p> <p>Article 20 _KMD supports Football for A New Tomorrow (FANT), p. 32</p> <p>Article 21 _KMD supports European parliamentary elections and others, p. 12 _Partnership with DaneAge on IT skills for senior citizens, p. 32</p> <p>Article 26 _Partnership with Homework Help Online, p. 31 _Partnership with LøkkeFonden on Khan Academy, p. 31 _Supporting DigiGuides, p. 31</p>	<p>Article 2 _In 2014, KMD adopted a new diversity policy, p. 34</p> <p>Articles 22, 23, 24, 25 _KMD complies with all statutory requirements on working environment, pay and freedom to join a union, p. 20 _Through our works council, we conduct constructive dialogue with the union HK/Samdata, which is authorized to negotiate on its members' behalf. In addition, KMD worked with employee representatives to implement a process that ensured that as few employees as possible lost their jobs as a result of structural adjustments in the Company, p. 20 _Whistleblower scheme for all employees, p. 37</p>		
PRINCIPLE 2: Business should make sure that they are not complicit in human rights abuses.				<p>Articles 23, 24, 25 _In 2014, KMD entered into an agreement with the internationally renowned EcoVadis SAS to screen KMD's high-risk suppliers. The first campaign involving selected suppliers was conducted in 2014 and the first evaluation is expected in Q1 2015. A further two campaigns will be conducted in 2015, p. 37</p> <p>_In collaboration with our waste management supplier for our sites in eastern Denmark, KMD has built a picture of the total carbon footprint from the collection and disposal of waste from our sites, p. 36</p> <p>_In 2014, KMD was recertified under the ISO 14001 environmental management standard, p. 36</p> <p>_In 2014, KMD continued e-learning training for all customer-facing employees in anticorruption and corporate compliance, p. 38</p>
PRINCIPLE 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.				
PRINCIPLE 4: Businesses should uphold the elimination of all forms of forced and compulsory labour.				
PRINCIPLE 5: Businesses should uphold the effective abolition of child labour.				
PRINCIPLE 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.				
PRINCIPLE 7: Businesses should support a precautionary approach to environmental challenges.			<p>_In 2014, KMD was recertified under the ISO 14001 environmental management standard, which ensures that we maintain focus on our environmental efforts and effects constant improvements, p. 36</p>	
PRINCIPLE 8: Businesses should undertake initiatives to promote greater environmental responsibility.			<p>_In collaboration with our waste management supplier for our sites in eastern Denmark, KMD has built a picture of the total carbon footprint from the collection and disposal of waste from our sites, p. 36</p>	
PRINCIPLE 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.			<p>_In 2014, KMD took part in a national campaign for DONG Energy in connection with our Climate Partnership, sharing experiences of our energy-saving efforts.</p>	
PRINCIPLE 10: Businesses should work against corruption in all its forms, including extortion and bribery.				

The articles cited in the table refer to the UN Universal Declaration of Human Rights.

DIGITAL WELFARE

RESULTS IN 2014

For many years, KMD's CSR relating to digital welfare has focused in particular on health and education. KMD sees real potential for digital solutions to the demographic and economic challenges facing the Danish welfare model and aims to support this process in a responsible manner. We are therefore concentrating on sharing solutions and knowledge, while remaining aware of the challenges increased digitization may present for some groups in society.

EDUCATION

The digitization of schools and training for young people is a focus area for KMD, and was supported by the following four initiatives in 2014:

HOMEWORK HELP ONLINE

KMD partnered with the State and University Library in 2012 to establish three online homework cafés at our sites in Ballerup, Odense and Aalborg. The main target group is children and young people from disadvantaged areas, who are typically unable to get help with homework from their parents. Boys in particular tend not to use the physical homework cafés in their local communities¹.

We were able to provide help on just under 1,200 occasions in 2014².

Besides providing help with homework, KMD also worked with the library on further developing the digital platform for the project. In 2014, KMD and the State and University Library increased the target group for homework help by launching Lektier Online Gym, which is available to all upper-secondary schools in Denmark, and entering into an agreement with three local governments, which now offer online homework help to all pupils in their areas.

Read more at www.statsbiblioteket.dk/lektier-online (in Danish).

LØKKEFONDEN AND KHAN ACADEMY

KMD has been working with LøkkeFonden – a charity founded by former prime minister Lars Løkke Rasmussen “to bring boys back from the edge to become useful members of society” – since 2012 on creating a Danish version of the world's most widely

used online educational resource, the much-praised Khan Academy.

Khan Academy is a platform that enables students to improve their skills, particularly in the natural sciences. At the heart of the platform are a number of exercises, tests and instructional videos, which have previously been available only in English. KMD and LøkkeFonden are in the process of translating the whole platform so that Danish students and teachers can access the entire public school curriculum via Khan Academy.

As of the end of 2014, a total of 892 mathematics videos had been recorded and uploaded to Khan Academy Denmark's YouTube channel, and a beta version of the entire platform had been launched at da-dk.khanacademy.org/. KMD expects to launch a full version of the platform in the first half of 2015.

DIGIGUIDES

KMD joined forces with the teacher training programs at University College Copenhagen (UCC) in 2013 to set up a corps of DigiGuides – teaching students with a special interest in IT and digital learning tools who can help teachers and students with digital solutions. In 2014, KMD supplied iPads and enabled DigiGuides to extend their subject knowledge by attending conferences.

KMD EDUCATION AWARD

In 2014, KMD established the KMD Education Award, presented to an individual or group of teaching students who has/have taught material based on digital resources during their teaching practice. Only teaching students from UCC were eligible to take part in 2014, but from 2015 the competition will be open to all seven university colleges, enabling all teaching students to take part. Each university college will nominate its own winner, and the national winner will then be chosen from the seven regional entries and announced at the Schools Fair in Aarhus on 23 April 2015.

The competition reflects KMD's wish to put the use of digital resources in public schools in focus and to create a positive attitude to this at Denmark's teacher-training colleges. In this way, we can support the training of the teachers of the future using the teaching tools of the future.

HEALTH AND SOCIAL CARE

KMD views health and social care as an important area of the welfare state where digital solutions have great potential to reduce costs and improve quality of life for both patients and the wider public.

¹ State and University Library, Study of pupils' opportunities for help with homework, 2010.

² KMD's employees are able to swap their normal working hours for shifts as online helpers. All of the helpers are given introductory training and are then offered further training in homework help on an ongoing basis.

DANEAGE

In 2014, KMD and DaneAge – Denmark's largest organization for the elderly – launched a new version of their e-learning program for those with limited computer literacy as part of the organization's drive to raise the general level of IT skills among senior citizens. The introduction of digital post from 1 November 2014 makes the new digital reality a challenge for many older people.

The program has been developed jointly by KMD and volunteer IT teachers from DaneAge and complements the thousands of IT courses the organization already runs each year. KMD and DaneAge's aim was for at least 25,000 users to have used the program in 2014. By the end of 2014, the program had attracted more than 54,735 unique users since 2012 and 19,833 users for 2014 in isolation³ – a figure largely unchanged from 2013 (19,932 unique users). This meant that we did not achieve our target of 25,000 users in 2014.

KMD and DaneAge also had a target for the program to be used by a minimum of 60% of all DaneAge teachers, which, at 57%, was almost achieved. This is an increase of 13 percentage points from 2013, when 44% were using it.

You can find more information on the partnership at www.aeldresagen.dk/dus-med-pc (in Danish).

DANISH LUNG ASSOCIATION

KMD continued its partnership with the Danish Lung Association in 2014, working specifically on a new online patient network, snakomlunger.dk (in Danish), which enables lung patients to draw inspiration and strength from one another. The network was launched in May 2014.

As well as the online patient network, in 2014 KMD also supported the Danish Lung Association's "Swim for life and lungs" project, with 29 KMD employees raising DKK 18,000 for the association in a sponsored swim held in conjunction with sea swimmer Henrik Slot Nielsen swimming 18 km from Bornholm to Christiansø to raise money for and awareness of lung issues.

In addition, more than 400 KMD employees took part in the KMD 4:18:4 and KMD IRONMAN⁴ triathlons in Copenhagen in T-shirts supporting the Danish Lung

Association, alongside 75 lung patients, lung specialists and Danish celebrities. KMD's employees also had the chance to test their lungs at KMD's headquarters in Ballerup, when the Danish Lung Association carried out lung function measurements in August.

KNOWLEDGE-SHARING

KMD's analytical unit published two reports in 2014: one on digitization of European Parliamentary elections, and one gauging leadership and management conditions in the local government sector and the digitization of the two big welfare areas: schools and elderly care. The latter was carried out in collaboration with the Danish Association of Local Government Executives and Danish associations representing managers in the local government, social, health and labor market areas, and children's and cultural affairs⁵.

In 2014, KMD continued to engage users of the social media Facebook, LinkedIn and Tumblr in debate and knowledge-sharing on digitization of the health and education sectors in three communities, including one that seeks to involve parents in their children's learning.

OTHER MEASURES

In 2014, KMD supported the Danish organization FANT (Football for a New Tomorrow), which uses sport as a means to heal the wounds left by the long civil war in Sierra Leone. KMD provided sportswear and other equipment from its stock, as well as old laptops for the organization to use for its work in Sierra Leone.

In addition, KMD donated DKK 29,500 to a Danish charity that provides PCs to children in care. The money came from employees, who chose to donate their Christmas gifts to this good cause.

KMD considers its CSR work relating to digital welfare to be satisfactory.

³ As of 19 December 2014.

⁴ The KMD IRONMAN consists of a 2.4 mile swim, a 112 mile cycle ride and a 26 mile run. The KMD 4:18:4 is a 10th of the full KMD IRONMAN.

⁵ The reports can be found at kmd.dk/analyse.



GOALS FOR 2015

EDUCATION

Homework help: KMD will continue to offer help with homework online. The goal is for KMD's employees to provide help on at least 1,200 occasions.

Khan Academy: Together with LøkkeFonden, KMD will launch a full Danish version of Khan Academy.

DigiGuides: KMD will continue to support the DigiGuides project.

KMD Education Award: KMD will present KMD Education Awards at all seven university colleges across Denmark before selecting a national winner in April.

HEALTH AND ELDERLY CARE

DaneAge: KMD and DaneAge will achieve a minimum of 30,000 unique users for its e-learning program, with at least 60% of DaneAge's IT volunteers using the program in their teaching.

Danish Lung Association: KMD and the Danish Lung Association will join forces to offer lung function tests to all KMD employees, as well as raising awareness of lung issues by means of joint participation and activities in connection with the KMD 4:18:4 and KMD IRONMAN triathlons.

EMPLOYEES

RESULTS IN 2014

KMD wants to be an attractive workplace where employees are proud of the contribution we make to society – by virtue of both our products and our behavior and knowledge.

We believe that we will remain strong as a company if we create clear structures for our employees and give them scope for personal and professional development.

KMD operates in a highly competitive market, requiring us to manage costs so as to match competitors' prices, and in 2014 this meant having to say goodbye to talented colleagues. A total of 109 job losses were originally announced in August, but positive and constructive dialogue with employee representatives on the redundancy process reduced the number of layoffs to 66.

New local agreements were negotiated in the spring to bring KMD's employment terms in line with the market. The changes, which came into effect on 1 January 2015, include employees being transferred to function-based salaries and a standard 37-hour working week compared with 34.5 previously. On the other hand, we now offer an improved bonus scheme and a new health insurance agreement for all employees.

As a consequence of the adjustments, satisfaction with KMD as an employer has declined, with KMD employees reporting a level slightly below the average for comparable companies in 2014.

DIVERSITY

In 2014, KMD adopted a diversity policy addressing issues such as the representation of women in management and attracting more new graduates.

Our goal is for the most promising prospective employees in the Danish labor market to choose KMD regardless of gender, ethnicity, age, religion or sexual orientation.

In 2015, we will increase the number of graduates and allocate at least 25% of new appointments to this group. One of the means to achieve this is the KMD Graduate Program, which started recruitment in October 2014. A total of 25-30 graduates are expected to join KMD in 2015.

KMD launched a policy in 2013 for the representation of women on the Board of Directors, including a target of 17% by the end of 2016. With a share of 14.3%, this target has not yet been achieved.

In addition, KMD has set a target of having a number of female managers proportionate to the number of female employees. In 2014, 34% of KMD's employees were women and the share of women at all levels of management was 27%.

HEALTHY EMPLOYEES

KMD conducted a workplace assessment in 2014, which showed that the working environment – both psychological and physical – is generally good. Some areas require extra focus, however. For example, 6.3% of employees reported that they had been signed off work with stress or stress-related symptoms. In addition, 102 employees (3.6%) stated they have experienced workplace bullying. We are very alert to the need to reduce bullying and protect employees from stress, and this will be a focus area in 2015, taking as its starting point the existing antibullying policy that forms part of our employee policy.

Average sickness absence was 6.37 days in 2014, which is 12.3% below the national average for private companies with office-based activities. This is on a par with KMD's performance in 2013 (6.4 days), and KMD aims to maintain this level in 2015.

With this in mind, KMD has established a health insurance scheme for all employees that provides access to advice in the case of sickness absence, preventive measures, cross-disciplinary treatment, treatment insurance guaranteeing quick and efficient treatment, and, not least, initiatives to counter long-term sickness absence, and the opportunity to obtain confidential advice on everything from personal to workplace-related issues. The entire package is geared toward preventing long-term sickness absence, benefiting both individuals and KMD.

More than 400 employees took part in the KMD 4:18:4 and KMD IRONMAN triathlons in 2014 – both the half- and full-length versions – with training organized at KMD's sites. In addition, more than 800 employees took part in the DHL 5x5 km relay race.

KMD considers the overall results of its CSR work in relation to employees to be satisfactory.



GOALS FOR 2015

DIVERSITY

KMD wants to maintain a share of female managers that is proportionate to the number of women employees (27% as of 31 December 2014).

KMD also wants to increase the proportion of new graduates.

HEALTHY EMPLOYEES

KMD will maintain focus on a healthy workplace based on its already successful sports clubs. Special training programs for employees wanting to take part in the KMD 4:18:4 and KMD IRONMAN triathlons will continue across the business. KMD expects more than 500 employees to take part in one of these events.

KMD will also seek to maintain low levels of sickness absence and reduce the proportion of employees with stress or stress-related symptoms to below 5%.

CLIMATE & ENVIRONMENT

RESULTS IN 2014

As one of Denmark's largest IT companies with around 3,000 employees plus large data centers and Denmark's largest print center, each year KMD uses a similar amount of electricity to a town of 18,000 people, while our print center and office printers print the equivalent of 280 million pages.

We are very aware of our environmental footprint, and in 2013 we were certified under the international environmental management standard ISO 14001. In 2014, we conducted an audit of our environmental management system. Our structured approach to environmental work, which has been developed over many years, and is now certified, proved to have a positive effect on a wide range of parameters in our environmental policy, which focuses on energy consumption, transport and waste management.

In 2015, KMD will launch a strategy and policy to ensure progress in environmental work.

ENERGY CONSUMPTION

KMD's electricity consumption totaled 30,356,802 million kWh, a slight increase of just under 1 million kWh compared with 2013 (3.4%). This was mainly because KMD gained a whole series of major outsourcing customers in 2014, which has increased production in our data centers.

Since 2009, KMD has identified 97 different energy-saving projects and realized 86% of their potential. As a result, since 2008 we have made savings of 8.6 million kWh, equivalent to the annual consumption of more than 1,600 detached houses⁶ or 28.1% of our total energy consumption in 2008. In addition, our total consumption of heating fell by 612.4 MWh in 2014.

As part of KMD's climate partnership with energy supplier DONG Energy, since 2009 we have purchased renewable energy certificates from DONG Energy's Horns Rev 2 wind farm equivalent to our total carbon emissions from direct energy consumption. KMD also purchases CO₂ quotas to compensate for heating consumption.

KMD's total carbon emissions from direct energy consumption totaled 12,354 tons in 2014, up 13.7% on 2013. The majority of this increase was due to a less green overall energy mix in Denmark. There was also a slight increase in carbon emissions from heating

⁶ An average detached home with four inhabitants consumes 5,181 kWh per year. Source: DONG Energy.

consumption despite a fall in total energy consumption. This is due to an increase in the CO₂-equivalent for district heating of more than 26%.

Since 2008, KMD has cut its carbon emissions from 17,796 to 10,864 tons, a reduction of 38.9%.

TRANSPORT

Since 2010, KMD has worked hard to reduce carbon emissions from transport between its sites. Having reduced transport by 5.5% in 2013, carbon emissions from transport rose by 1.3% in 2014. Among other things, this is because KMD's new organization has increased the need for coordination and management of employees at multiple locations – particularly between headquarters in Ballerup and the site in Aalborg – and the result has been an increase in air travel. The goal of reducing internal transport between sites by 10% by the end of 2014 has thus not been achieved.

WASTE

Another focus area during the year was increasing the recycling rate and gaining a picture of the carbon emissions associated with waste collection as a first step in mapping our carbon footprint from cradle to grave.

KMD increased the proportion of waste recycled at its print and data centers from 72.2% in 2013 to 84% in 2014. This means we have increased the proportion of waste recycled from 68.8% in 2012 and are therefore far above the target of a 5% increase in the recycling rate by the end of 2014. Focus has now shifted to overall recycling at all sites, with a recycling rate of 62.9% achieved in 2014. KMD will increase this by 5% by the end of 2016⁷.

Together with our waste management supplier, Henrik Tofteng A/S, we have launched a project to build a picture of the total environmental impact from the collection and disposal of the waste we generate.

KMD considers the overall results of its environmental efforts to be satisfactory.

⁷ The recycling rate excludes waste from the sites in Aalborg and Odense, which is measured by collection and not by weight. The bulk of KMD's waste is generated at the site in Ballerup, Copenhagen, which is home to KMD's print center and more than 50% of its employees.



GOALS FOR 2015

CARBON EMISSIONS

KMD will continue to focus on energy savings in both data centers and offices, but still anticipates a slight increase in energy consumption due to an ever larger customer base.

KMD will continue to focus on reducing employees' transport between sites. We expect to be able to reduce our carbon footprint from transport by 10% by the end of 2016. Further action will be needed to achieve this.

WASTE

There will be continued focus on KMD's print consumption in office buildings. The breakthrough of follow-me printing will be followed up with campaigns directly targeting employees' print consumption as well as sorting waste at source. KMD's target is still to increase the total proportion of waste recycled by 5% by the end of 2016.

ENVIRONMENTAL MANAGEMENT

KMD will continue work on the ISO 14001 standard. We will introduce a common system of environmental accounting across the Company and focus on continual improvements in terms of our environmental data so that we can continue to improve in general terms the environmental work that has characterized the last five years, and reassure our customers and partners of KMD's unwavering commitment to climate and environment issues.

SUPPLY CHAIN

RESULTS IN 2014

Signing the UN Global Compact has committed KMD to 10 fundamental principles relating to protection of human and labor rights, climate and environmental issues, and anticorruption measures. This provides KMD with a concrete framework for the requirements the Company makes of itself and its suppliers.

At the same time, KMD wants to keep tight control of its own processes to ensure that the Company complies with relevant legislation and its commitments under the Global Compact, and sets requirements for its own suppliers that support these commitments.

Accordingly, in 2014 KMD entered into an agreement with the internationally renowned EcoVadis SAS, which carries out online screenings of suppliers. This work will be anchored in KMD's new central procurement department under KMD's first Senior Vice President, Procurement. This step will strengthen KMD's control of its supplier portfolio and ensure a more uniform approach to suppliers in general and high-risk suppliers in particular.

PARTNERSHIPS

In 2014, KMD implemented a new screening tool from EcoVadis SAS. Over the next few years, KMD will screen all high-risk suppliers on an annual basis. Suppliers are identified on the basis of criteria such as revenue, geography and industry. The screening facilitates fact-based dialogue with our suppliers about their CSR work, while placing our Supplier Code of Conduct in a concrete context. This will help us reach our goal of all key suppliers working in accordance with the principles of the UN Global Compact by the end of 2015.

KMD intends to work with suppliers to draw up action plans to help them improve their work in selected areas.

KMD has also started working with its waste management supplier, Henrik Tofteng A/S, on mapping the environmental impact of the collection and disposal of the waste we generate.

CORPORATE COMPLIANCE

In 2014, KMD reviewed its policies in relation to the 10 principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises. As a result, we have revised our CSR policy so that it refers more explicitly to human rights and drawn up a new diversity policy. We have also revised our employee policy such that it now refers to the other policies in the relevant areas.

We also maintained focus on our work on regulatory compliance, especially with UK and US anticorruption rules in light of KMD's ownership.

With assistance from external consultants, KMD has produced a gap analysis and a risk analysis based on Transparency International's recommendations to optimize the prioritization of future compliance measures.

As KMD does business mainly with the public sector, however, we have decided to strengthen the training of customer-facing employees in anticorruption. Besides the general introduction to compliance given to all new employees, in 2014 KMD therefore developed and implemented a specific e-learning program on anticorruption for customer-facing employees. Completion of the program is compulsory, and at year-end 2014 more than 1,700 employees had completed it.

The introduction of a whistleblower program in 2012 has given all employees and members of the Executive Board and the Board of Directors an alternative to the regular reporting pathways when reporting breaches of legislation and KMD's internal rules.

The whistleblower program covers the seven key compliance areas at KMD: anticorruption, IT security, authorizations, competition law, intellectual property rights, contractual risk management and document management/storage. Two cases were reported and dealt with through the program in 2014.

KMD considers its work on CSR in the supply chain to be satisfactory.



GOALS FOR 2015

PARTNERSHIPS

KMD will draw up relevant action plans for selected suppliers identified via screenings in the EcoVadis system.

KMD will also continue to work with suppliers to map our environmental footprint throughout the value chain.

CORPORATE COMPLIANCE

KMD will continue the screening of high-risk suppliers using the EcoVadis tool.

KMD will also continue implementation of the prioritized compliance measures, which include having notification of extension of the whistleblower program – to cover external reporters, updates to the e-learning program and general updates to policies in the compliance area – approved by the Danish Data Protection Agency.