



D-seal questionnaire of data ethical considerations

Cf. requirement 8.1.1.1

Question 1					
Has the company considered possible solutions to improve its work in data ethics? E.g., establishment of a data ethics working group, awareness-raising activities, culture of transparency.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
Based on our data ethics considerations, we work with Zero-knowledge data bank, through which we minimize data that is stored and shared both internally in Safe Online and what is shared externally through our product portfolio. All products in our portfolio are involved with improving data ethics for the companies that buy the products, and for the consumers who download our app and thereby help the companies. Internally, we continuously work to articulate the importance of data ethics. Our data ethics bases are included in the employee handbook. Data ethics is the basis for our SaaS solutions.					

Question 2					
Has the company considered regular involvement of relevant stakeholders? E.g., to avoid unintended bias.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
We work together with the NGO "Data for good" to drive the data ethics agenda and ensure ethics around us products.					



Question 3					
Has the company considered the possible impact of influencing users' behaviour? E.g., counteract addiction, over-consumption, bullying.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
Our focus is to ensure the reduction of the consumer personal data as well as help companies to correct data ethical behavior.					

Question 4					
If the company can influence users' behaviour, has it considered how this can be made more transparent and how users can be given more control?					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
We give the consumer insight into their own personal data and help them gain control over it. We make GDPR legislation easy for the consumer to use and easy for the company to comply with.					



Question 5					
Has the company considered how users' rights can be prioritised over commercial or institutional interests?					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
See answer above.					

Question 6					
Has the company considered how users can derive the maximum value from the data that is collected?					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
Our vision for Safe Online ApS is to work towards democratizing data and making it possible for the user even to monetize data.					



Question 7					
Has the company considered how to avoid unintended consequences? E.g., surveillance, misuse, spread of misinformation, or similar.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
Through the zero knowledge database, Safe Online ApS does not have access to user data and thus helps companies to not have access to these either.					

Question 8					
Has the company considered how to protect specific target groups? E.g., children and young people or groups with special needs.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments					



Question 9					
Has the company considered whether data collection and solutions/products could limit the rights of citizens?					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
<p>Yes, this is essential to Safe Online.</p> <p>Our privacy-first principles At Safe Online we've worked hard to develop a privacy-first culture based on the following principles:</p> <ul style="list-style-type: none"> • Transparency and good faith. We keep our policies updated and are happy to give you more information and access to your data whenever you request it. We provide a dedicated request portal in our website footer for this purpose. • Data minimization and purpose limitation. We only collect the data we need to give you access to our software, and we won't use your data for any other undisclosed purpose. • Minimum privilege and access control. Our products were designed to help you manage your own company's personal data. We operate on the principle of privacy-by-default and collect only the minimum amount of data necessary to provide our users access to each of our products and our website. Then, the data is only used for the purpose collected. Our own access to it is limited as strictly as possible. For example, only 2 developers can access DataMapper data, and only with two written consents from your company. • Security awareness and confidentiality. We train our team to be aware of security risks and to understand the importance of protecting personal data. This awareness starts with our developers, who base all our products on the principles of privacy by design and by default; and it extends to our customer service team as they treat even basic things like your name and email as private. <p>We translate these principles into practical tools to help our customers secure their data - Privacy Wallet is an excellent example of this.</p>					

Question 10					
Has the company considered whether it can avoid exacerbating social and ethical problems? E.g., inequality, exposure of population groups or segments, or limiting the use of a solution to particular users.					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



digital trust

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments					
Not relevant.					

Question 11					
Does the company communicate its privacy-by-design strategies to its users?					
Not relevant	No considerations to note	Some considerations	Measures planned	Measures implemented	Continuous process established
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments					
We communicate our privacy-by-design strategies to users on the website.					



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