



# Better Collective

## Data Ethics Policy



## Introduction

The Better Collective Group is committed to satisfy the regulatory requirements and comply with relevant national, international, and supranational legislations. Taking into account that Better Collective is subject to Section 99d of the Danish Financial Statements Act, the Group has to meet requirements with regard to reporting on its' ethical processing of data. The purpose of this policy is to promote Better Collective's data ethics principles and to meet the requirements of mandatory laws. This policy states our dedication and commitment to protecting and handling data in accordance with ethical practises and standards.

## Purpose and Scope of the Policy

This policy identifies, maps, explains and disseminates the relevant ethical aspects of data processing, and enhances the data processing quality in Better Collective - while it also ensures an organisational anchoring of the Group's data ethics work. Additionally, the policy promotes the highest management in Better Collective, including the Board of Directors, as ambassadors of data ethics within the Group.

This policy obliges all employees in Better Collective to process data ethically and in accordance with principles laid down by this present policy. Moreover, all entities that process data on behalf of Better Collective must adhere to the promoted principles within this policy. This policy has supremacy over other data-related policies including (but not limited to) data protection and privacy policies adopted and published by Better Collective.

Unless otherwise stated, the direction given in this policy applies to all markets and businesses in the Better Collective Group. Whenever Better Collective acquires a controlling interest in a company, applying the policy into the business processes of the newly acquired company is mandatory. Whenever Better Collective is a minority shareholder, the Group will seek to promote the principles set out in the policy.

## Who We Are and Why We Process Data

Better Collective is a leading sports betting media group that connects sports enthusiastic bettors with betting operators through innovative technologies and trusted digital products centred on educational and responsible sports betting content. Our vision is to empower online bettors by creating a transparent and safer betting experience in a growing and more complex entertainment industry.

At our websites users can get access to educational content around sports betting, compare odds and bookmakers, share analysis, tips, and the excitement when their favourite team or athlete competes. As such we aid users to navigate safely among bookmakers that match their individual needs, while we also provide leading online bookmakers with targeted user acquisition and engagement.

Throughout our efforts we employ data to provide our users with a unique and educational experience whenever they visit our websites and/or engage in our communities. To give our users the best and



most relevant experience possible, we process various categories of data including user-related data and personal data.

Running in this line, Better Collective is also committed to the promotion of responsible gambling and development of innovative approaches that contribute to the collective wellbeing of society. Mindway AI, of which Better Collective is a majority owner, creates innovative and advanced award-winning solutions for the identification of at-risk and problem gambling through the use of artificial intelligence, neuroscience, and sophisticated data processing. Mindway AI works with operators, platform providers, regulators, and governments to supply state-of-the-art early detection and intervention solutions for safer gambling.

## Our Data Ethics Principles

### Welfare and dignity

As a sports betting media group, we aim to make gambling entertaining, transparent and fair. Therefore, our data processing activities are designed to augment, complement, and empower human cognition as well as to enhance the user experience.

We respect, and always strive to protect, the dignity of our users. This is why we continuously balance our commercial interests with those of the public. Processing user data is primarily carried out for the benefit of our users. The data processing within Better Collective is therefore unlikely to precipitate situations that may bring about unjustifiable subordination, coercion, deception, manipulation, blackmailing or any other form of individual harm.

### Freedom, equality, and fairness

Better Collective processes data with respect to fundamental freedoms and rights in a democratic society. Our data processing practices are founded on the equal and just distribution of both benefits and costs in order to ensure that individuals and groups are free from unfair bias, discrimination and stigmatisation. Ultimately, we strive to ensure that our data processing will never result in any kind of ideological polarisation or determinism.

### Privacy

We are dedicated to protecting the privacy of our users. Therefore, we employ our best efforts to protect users' data including personal data. Any processing of personal data must always comply with relevant EU and national data protection laws as well as with applicable ethical standards.

### Legal certainty

All data processing activities carried out by Better Collective must be lawful. This means that whenever Better Collective processes data, the legal grounds laid down by the laws in question must be implemented and adhered to.



## Transparency

The practice of data processing in Better Collective is run in line with the principles on transparency. Data processing practises are explained in a clear, concise and understandable manner. Additionally, Better Collective seeks to provide information about data protection practises in languages that individuals understand.

## Security

Better Collective implements appropriate technical and organisational measures to ensure a level of data security appropriate to the risk, considering the costs of implementation, the nature, scope, context and purposes of processing.

## Responsibility

Better Collective is dedicated to determining the responsibility of all employees in a transparent manner. The responsibility is determined in accordance with dedicated roles as well as the scope and nature of designated working tasks.

## Policy Implementation

This policy must be consistently implemented throughout all activities that include data processing within Better Collective. For the purpose of implementing the policy in practice, development and enforcement of additional policies, procedures, protocols, and processes in accordance with principles laid down by this policy are strongly stipulated.

Raising awareness about ethical aspects of data processing and relevant educational campaigns should be organised on a regular basis for the purpose of providing adequate information and instructions to employees at Better Collective. Employees are encouraged to consult about the policy principles and their implementation in practice.