Data Ethics Policy

This Data Ethics Policy describes the overall ethical principles for how the Lundbeck Foundation (including Lundbeckfond Invest A/S) uses data and serves as a supplement to the Foundation’s existing privacy notices on data protection.

We strive to adhere to the principles set out herein, and expect grant recipients, reviewers, and employees to comply with it, and with due regard for, local conditions and norms.

The term ‘data’ covers data of all types and from all sources, including publicly available data, such as that collected from grant-applicants, their research, reviewers, commercial partners or employees, as well as statistical, financial, and corporate data, and data derived data.

Data is used in our operations and to allow applications and their reviews. We strive to offer clarity on the type and source of data used, and to communicate its purpose to all involved via relevant privacy notices and guidance.

Data is gathered with the sole purpose of providing knowledge and information relevant to the Foundation’s activities, and its use should always be guided by the following principles:

Human interests before commercial interests
Data utilised should ultimately have a human benefit. If there is a conflict between human and commercial interests, human interests should always prevail.

Transparency
Data uses should be clear or easily explained. When personal data is utilised, the legitimate reason for doing so should be made clear, or properly informed consent should be obtained from all involved.

Anonymisation
Data should be anonymised or pseudonymised unless personalisation is a requirement for achieving the targeted results.

Autonomy
We believe that individuals should have control over the use we make of their data. Further, we do not use automated decision-making or artificial intelligence on data either provided or collected.

Accountability and governance
Accountability is an integral part of responsible data use, and we go to great lengths to reduce the risks for the individual, and to mitigate undesirable social and ethical implications.
We endeavour to integrate data ethics into all our daily management and business decisions, including when acting as stakeholder in other concerns.

Even with effective standards, policies and processes in place, data usage has the potential to lead to challenges, problems, and errors. We seek to prevent this by developing a positive culture among employees that promotes openness and encourages the continuous improvement of processes and systems.

The Data Ethics Policy is overseen by the Data Protection Officer, who reports on data ethics and escalates any issues to the executive management, as required.