Systembolaget Data Sharing and Use Protocol for Product Carbon Footprint (PCF)

Version 1.0 | 2025

1. Purpose

This protocol outlines how data submitted via the CarbonCloud system will be handled and used by Systembolaget. Its purpose is to ensure clarity, transparency and trust regarding how Product Carbon Footprint (PCF) results and underlying data may be used for internal and external purposes.

This document outlines defined use cases, boundaries and activation conditions, and ensures that no extended, external or strategic use of data will occur before the criteria stated in Section 5 are met.

This protocol will be updated over time as Systembolaget's processes and needs evolve. Any expanded use of data beyond the internal use cases described in Section 4 will be communicated in advance, and Data Contributors will be given sufficient time, in advance, to review and verify their data before such use begins.

2. Scope

The protocol applies to all data submitted via CarbonCloud platform, including both Default Data and Primary Data (as defined below). It covers data used for generating PCF results and includes data related to cultivation, production, packaging, and transports.

CarbonCloud, as system provider, acts as a data processor on behalf of the Data Contributor and processes data solely in accordance with documented instructions and this protocol.

3. Data Types

3.1 Primary Data

Data obtained from a direct measurement or a calculation based on direct measurements, specific to a Data Contributor, such as energy usage, transport distances, ingredients, formulations, packaging, or cultivation practices.

Primary Data may also include company-specific datasets or parameters that are not fully site-specific measurements, but are developed by or for a specific Data Contributor (e.g. company-specific malt or packaging datasets). Such data represent a higher level of specificity than generic default data and are treated as part of a combination of Primary and Default Data in PCF calculations.

3.2 Default Data

Standard values from external databases or industry averages used when primary data is not available.

4. Data Needs and Intended Usage

Data needs are categorized into three levels, depending on intended use. Each level involves different levels of detail and access for internal and external purposes.

Initial internal use: Section 4 describes how PCF values may be used internally based on Default Data or combinations of Default data and Primary Data. No external use will occur until the criteria in Section 5 are fulfilled.

Level 1 – Product Carbon Footprint (Total)

What: Total PCF per product calculated by CarbonCloud.

PCF based on Default Data:

- Conduct internal simulations, exploratory analyses and high-level reviews to understand overall data patterns and how Default Data is applied across products.
- Once Default Data has undergone defined quality assurance, total PCF values may be used in Systembolaget's sustainability reporting.

PCF based on a Combination of Default and Primary Data:

- Conduct high-level, preliminary analyses.
- Gain an initial understanding of PCF levels, variation, and emission drivers.
- Support the development of future quality assurance processes and methodologies.
- Once total PCF values have undergone defined quality assurance, they may be used in Systembolaget's sustainability reporting.

***Note**: Insights at this stage are preliminary, will not be used for steering or decision-making, and external communication is not permitted. Extended use will only occur once all activation criteria in Section 5 are met.*

Level 2 – PCF per Module

What: Module-level PCF (cultivation, production, packaging, transport).

PCF based on Default Data:

- Internal simulations, exploratory analyses and high-level reviews to understand overall data patterns and how Default Data is applied across products.

PCF based on a Combination of Default and Primary Data:

- Conduct high-level, preliminary analyses.
- Gain an initial understanding of module-level PCF variation and emission drivers.
- Support the development of future quality assurance processes and methodologies.
- Identify gaps in data completeness and the potential reporting barriers that contribute to them

***Note:** Insights at this stage are preliminary, will not be used for steering or decision-making, and external communication is not permitted. Extended use will only occur once all activation criteria in Section 5 are met.*

Level 3 – Detailed Activity Data

What: Underlying data points used as input in PCF calculations, e.g. fertilizer type and volume, raw material inputs, site-specific LCA data for packaging, transport fuels and consumption.

Access: Systembolaget does **not** have access to detailed activity data submitted in CarbonCloud. These data points remain visible only to the reporting Data Contributor and are not available to Systembolaget for analysis or review unless explicitly shared in a separate process.

5. Future Use Cases Requiring Further Definition

Systembolaget will only use PCF data (total or module level) for external communication, assortment steering or other strategic purposes, including incentives, ranking effects or other business-related outcomes, once clear principles and processes for data quality are in place. Two conditions must be met before any such use is activated:

1. Decisions by Systembolaget on how PCF results may be used, regardless of whether they are based on Primary Data, Default Data or a combination, including clear and transparent rules, governance and boundaries for how results may be applied and what the implications of such use will be.
2. Sufficient time for Data Contributors to understand, review and influence the data underlying their PCF.

External or strategic use of PCF values will not begin until:

- Data quality processes have been established and communicated.
- Data Contributors have had the opportunity to review and update the data used to generate their PCF.

This protocol is updated with specific purposes, boundaries, and activation timelines relating to intended use of PCF data.