

Data Ethics

Policy

Contents

Introduction	3
Purpose	3
Data we use and process	3
How we collect data	3
Principles	3
Use of Computer Programs, Artificial Intelligence and Algorithms	4
Link to Columbus' Global Privacy Policy	4
Review	4

Data Ethics Policy

Introduction

We live in an age, where the digital world is evolving with unparalleled haste, continuously revealing new and innovative ways of improving our lives. With all the great possibilities following the digital transformation, however, also follows big responsibilities.

With our Data Ethics Policy, we wish to commit ourselves to the highest standards on how we process data, which is not only legally compliant, but also abides to our ethical values and morals. It is our sincere hope that with this Data Ethics Policy we may articulate our values and morals making them more visible to our customers, employees, and business partners, subsequently facilitating an even greater integration between our IT solutions and services and the right to privacy of any individuals whose data we process. The right to privacy is a fundamental human right, which must be protected and respected no matter what, along with the other fundamental human rights, as they all together correlate the foundation of modern society.

Purpose

The purpose of this Data Ethics Policy is to establish and describe the standards for data ethics that Columbus A/S group adheres to and to emphasise our commitment to a responsible and sustainable use

of data, and also to account for our general data collection and use in order to ensure transparency. Columbus will periodically review and revise the principles of this policy, to reflect evolving technologies, the regulatory landscape, stakeholder expectations, and understanding of the risks of data use in context of individuals and society.

Data we use and process

Columbus uses and processes data, which can be both personal data and non-personal data.

The personal data we collect and use as controllers are primarily contact information bank details of our customers and their employees to be able to deliver our consultancy services (and generate invoices), and internal data regarding our own employees, contractors, and prospective employees for administrative purposes. In addition, we also collect data from our websites regarding the visitor behaviour mainly for marketing and statistical analysis of our marketing campaigns. Lastly, we also buy data for direct marketing purposes.

We process data on behalf of our customers as data processors in connection with delivery of our consultancy services. In such cases, we always enter into a Data

Processing Agreement (DPA) and we only process according to instructions from the customer (Data Controller).

How we collect data

We primarily collect the data directly from our customers when we create customer accounts in our systems and during delivery of our consultancy services. We also collect data from third parties, e.g. our partners when servicing our customers. Lastly, we also collect data from our websites and job application web pages. In rare occasions, we buy data from providers of marketing contact information and analyses.

Principles

- Columbus complies with both Danish and EU law on data and privacy and protection. We do not exploit data to target, or help companies target, vulnerable individuals.
- Columbus perceives data ethics considerations as more far reaching than compliance with the law. It is our greatest endeavour to earn and uphold the trust of the people whose personal data we process, whether this is done in our role as data controller or data processor. We hold ourselves to the same degree of ethical standards while collecting, storing, or processing business data of organisations we interact with.

- It is always part of our data security considerations to be cognizant of what type of data we are processing, as the security measures must correspond to the sensitivity of the data being processed. This also applies to any non-personal or business data belonging to our customers and business partners.
- Data and information security have always been a fundamental part of Columbus' business, as it is of great importance to us that our customers and employees always feel safe when entrusting us with their data.
- Economical profit or any other material benefit may never override the fundamental rights and safety of an Individual data.
- We follow the international Information Security standard of ISO/IEC 27001 as our guideline. Information Security is and always has been a top priority to Columbus and will perpetually continue to be so in the future.
- All our employees are continuously and thoroughly trained on various Information Security principles, which embody data protection and security through a complete set of guidelines, tools, standards and templates for planning, delivering, managing, and documenting complex data processing scenarios.

- Columbus does not sell any data to any third parties or profit from it in any other way.
- Our Data Ethics initiatives and reporting is organisationally anchored with our Information Security Governance team and our Legal Department.

Use of Computer Programs, Artificial Intelligence and Algorithms

Columbus may deploy Artificial Intelligence (AI) powered solutions to achieve operational efficiencies and enhance day to day functioning. Also, consulting being our core business, Columbus may directly or indirectly offer or support AI development as part of its service offerings to the client. In any case, our AI usage and development will be governed by our core principles of not violating the rights of individuals and organizations, safeguarding data, and producing outcomes that are moral and ethical.

Columbus continues to evaluate new technologies to be competitive and provide value added services to our existing client base and new prospects.

Link to Columbus' Global Privacy Policy

<https://www.columbusglobal.com/en/privacy-policy>

Review

The Board of Directors will annually review and, if relevant, update the Policy.

Adopted by the Board of Directors on 16 December 2021.

Reviewed and approved by the Board of Directors on 11 December 2023.