

# Trifork Data Ethics Policy

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## 1 Introduction

- 1.1 This Data Ethics Policy (the “**Policy**”) sets out Trifork Holding AG’s (“**Trifork**” or “**Company**”) approach to data ethics. Trifork’s work with data ethics is further described in the Trifork’s management report in accordance with Section 99d of the Danish Financial Statements Act.
- 1.2 The purpose of this Policy is to describe the ethical principles which Trifork and its group members (individually each a “**Group Company**” and collectively the “**Trifork Group**”) must adhere to when using data and applying new technologies.

## 2 Type and Source of Data

- 2.1 In the Trifork Group we process various types of data such as:
  - Personal data provided by employees, job applicants, customers or any other third-parties.
  - Non-personal data on our operational assets or provided by customers or any other third-parties.
- 2.2 Trifork group process data for customers primarily in connection with the following activities:
  - Development and maintenance of IT systems
  - IT Infrastructure services
  - IT consultancy services
  - Digital services

## 3 Use of New Technologies

- 3.1 We use a broad range of technologies and help our customers adapt new technologies. We carefully analyze the impact on all involved parties when using new technologies. New technology will not be used to harm any persons.

## 4 Data Ethics Principles

### 4.1. Use of data:

- 4.1.1 Trifork Group will ensure that data is only collected and used in a lawful and fair manner.
- 4.1.2 Trifork Group will only process customer data based on instructions and never for its own purpose.
- 4.1.3 Where Trifork Group owns data, data will be processed only for the purposes they were collected for. We only collect the data that is necessary for the purpose of processing and we seek to minimize the data collected and processed.

### 4.2. Transparency

- 4.2.1 Trifork Group will always make sure that individuals should be able to understand how their personal data are used and the consequences hereof.
- 4.2.2 Trifork Group’s data principle shall be easily understandable and accessible for all.
- 4.2.3 Trifork Group will only share data with third parties based on explicit consent or if required to do so by applicable law or regulation.

### 4.3. Accountability

- 4.3.1 We recognize that data might be target for misuse or used for unintended purposes. We assess risks and protect data according to risk to data subjects. Further we have setup detection mechanisms and will respond to data breaches.
- 4.3.2 When we use suppliers to help processing data, we ensure that the supplier provide relevant protection capabilities. We require suppliers to have appropriate detection and response processes.

## 5 Approval, Governance and Reporting

- 5.1 This Policy is approved by Trifork's Board of Directors. Trifork Group's data ethics initiatives (including the development of procedures and training programmes) are anchored with the Chief Information Security Officer (CISO) together with the Executive Management.
- 5.2 We have developed additional policies, procedures and training material for our employees to ensure that we comply with this Policy.
- 5.3 The Board of Directors will annually receive reporting on data ethics initiatives in the Group.

## 6 Review and Amendment

- 6.1 The Board of Directors shall annually review, and if relevant update, this Policy.

## 7 Publication

- 7.1 This Policy will be published on the Company's website.

*Approved and adopted by the Board of Directors of Trifork Holding AG on 12 December 2022.*

**TRIFORK.**