

Data Ethics Policy for Complianter.

Version: 1.0

Effective Date: April 21, 2025

Next Review Date: April 1, 2026

Primary Responsible: CEO, John Poulsen

Secondary Responsible: CTO, Padmapriya Ramesh

1. Purpose

The purpose of this policy is to ensure that all data-related activities at Complianter are carried out with a strong ethical foundation, supporting our commitment to user trust, responsible innovation, and sustainable digital development.

We have established a continuous process with a yearly review of the policy. The review will be completed a Management Board level and if any changes are decided, they will be published at our website: www.complianter.dk

D-mærke spørgsmål: Har virksomheden overvejet løsninger til at forbedre arbejdet med dataetik? Fx nedsættelse af dataetisk arbejdsgruppe, awareness-skabende aktiviteter, åbenhedskultur.

Reply: Det har vi høj grad via en kontinuerlig proces, hvilket er beskrevet grundigt i denne politik.

2. Scope

This policy applies to all employees, contractors, and systems within Complianter that handle personal or sensitive data, regardless of the purpose or method of processing.

Therefore, we will include key suppliers and customers in the review process during the year. It is natural for us, that the key input will concentrate around IT security but also have a key focus on ESG and green IT development as described in UN Sustainable development goal (SDG 12) where reducing energy consumption in software development is described, as well as prolonging lifecycle for our developments.

We will not only focus on our own internal way of developing, but also focus on, where we can develop to aid our customers to have a more environmentally focused business.

D-mærke spørgsmål: Har virksomheden overvejet løbende inddragelse af relevante interessenter? Fx for at undgå utilsigtet bias.

Reply: Det har vi i høj grad via en kontinuerlig proces. Det er beskrevet ovenfor.

3. Principles of Data Ethics

3.1 User-centric Design and Development

- All system development is guided by usability, accessibility, and transparency.
- We aim to create intuitive interfaces that reduce user error and enhance trust.

3.2 Green IT and Sustainable Code

- We develop solutions with low energy consumption and minimal resource usage.
- Hosting is done in Microsoft Azure within the EU, using energy-efficient setups.
- Code and design are structured to support maintainability – changes (e.g. in styling or logic) are centralized wherever possible, reducing redundant code and computational load.

Also development servers at Microsoft Azure is powered off whenever the development team is not at work in order to increase IT security as well as save power.

3.3 Data Minimization and Purpose Limitation

- We only collect data necessary to deliver and improve our services.
- Data is never sold or shared with third parties unless it is a specific agreement between the customer and the 3. Party vendor as part of a specific IT function that benefits the specific customer.
- Any use of data is clearly tied to specific, transparent purposes and data is owned by the customers themselves, as we act as a platform for the customers.

D-mærke spørgsmål: Hvis virksomheden påvirker brugerens adfærd, har virksomheden i så fald gjort sig overvejelser om, hvordan det kan gøres mere transparent, og give brugeren mere kontrol?

Reply: Vi har indarbejdet en kontinuerlig proces, hvor netop brugernes awareness i forhold til beskyttelse af persondata er i fokus. Dette både i forhold til vores kontinuerlige udvikling af IT-plattformen, men også i forhold til, hvordan vi opbevarer persondata. Dette er grundigt beskrevet i vores politik for "Informationssikkerhed, IT sikkerhed og sikkerhedsbrud".

D-mærke spørgsmål: Har virksomheden gjort sig overvejelser om, hvorvidt data-indsamling og løsninger/ produkter kan begrænse borgernes rettigheder?

Reply: Vi har implementeret foranstaltninger der sikrer, at vi ikke indsamler og bruger data til andet, end kundernes egne ønsker. Vi indsamler ikke data, som vi anser som anvendelige til formål, som begrænser borgernes rettigheder.

3.4 Transparency and Communication

- Customers are informed through policies and contractual agreements and we have published this policy on our website. The policy on data protection "Privatlivspolitikken" is

also part of the contractual agreements with the customers and is uploaded both online, but also with each individual customer.

- Users have access to most data gathered, and always have the option to point out, if data is inconsistent or in violation with the terms of their employment at Complianter.

- In terms of customer access, we see ourselves as a platform Company, where Personal Data is to be limited in terms of access from Complianter employees. The data is seen as owned by the customers themselves, and not Complianter. Therefore, we will happily assist customers with deleting personal data, if they have trouble doing so themselves – if requested of course.

3.5 Accountability and Internal Responsibility

- Data ethics is a standing agenda item in management meetings every 6 months.

- The CTO is responsible for implementation; the CEO is ultimately accountable.

- All development decisions are assessed for their data ethics implications.

4. Handling of Data Breaches

- We maintain a separate incident response policy and dedicated logging mechanisms through our internal platform. There is a specific policy in place to make sure data breaches are handled in a proficient and timely manner.

- In case of a data breach, we notify affected customers without undue delay.

- To date, no data breaches have occurred.

We have a specific policy for this – describes in our internal website – as well as a technical solution for logging incidents.

5. Other key focus areas

5.1 Consequences of excessive use and behavioural implications

D-mærke spørgsmål: Har virksomheden gjort sig overvejelser om konsekvenserne forbundet med at påvirke brugerens adfærd? Fx modvirke afhængighed, overforbrug, mobning.

Reply: Vi ser dette som et sted mellem "Ikke relevant" og "Nogle overvejelser". Vi gør en grundig indsats for, at kunderne/brugerne ikke skal overimplementere administrative kontroller og processer. Det samme gælder internt hos Complianter, hvor organisationens størrelse pt. gør, at vores processer og organisatoriske opbygning er ekstremt ukompliceret/flad.

5.2 Data gathering

We only gather data where it specifically aids the clients or is a legal requirement in order to comply with regulatory requirements.

D-mærke spørgsmål: Hvis virksomheden påvirker brugerens adfærd, har virksomheden i så fald gjort sig overvejelser om, hvordan det kan gøres mere transparent, og give brugeren mere kontrol?

Reply: Vi anser dette som ikke relevant, da vi kun i begrænsede tilfælde behandler persondata, og det er altid som led i et kundeforhold med kontraktuelle forpligtelser.

5.3 Unintended Incidents

We have implemented measures to avoid unintended consequences such as misuse, surveillance, or misinformation.

A data classification scheme has been established and integrated where possible, ensuring that employees know whether data may be shared. Technical restrictions have also been partially implemented. In terms of monitoring, segregation of duties ensures that only administrators have access to log data.

D-mærke spørgsmål: Har virksomheden overvejet, hvordan de undgår utilsigtede konsekvenser? Fx overvågning, misbrug, spredning af misinformation eller lignende.

Reply: Absolut, vi har defineret en politik på området med en kontinuerlig review-politik. Der er samtidig udviklet en teknisk løsning til at logge hændelser.

5.4 Special or vulnerable groups and social and ethical problematic topics

We do not process data related to vulnerable or special user groups, such as children or socially disadvantaged individuals, unless our customers employ persons of these groups.

If so, we do not gather or handle data that identifies or limits data for these individuals.

Therefore, we do not see this consideration is not applicable.

The same goes for social or ethical problematic items, that can be of concern.

D-mærke spørgsmål: Har virksomheden gjort sig overvejelser om, hvordan virksomheden kan beskytte særlige målgrupper? Fx børn og unge eller samfundsgrupper med særlige udfordringer.

Reply: See this ethics policy.

D-mærke spørgsmål: Har virksomheden overvejet, om de kan undgå at forstærke sociale og etiske problemstillinger? Fx ulighed, udstilling af befolkningsgrupper og segmenter eller at en løsning kun kan bruges af bestemte brugere.

Reply: Ikke relevant: Vi behandler ikke persondata, som kan anvendes til det formål der beskrives i spørgsmålet.

6. Evaluation and Continuous Improvement

- The policy is reviewed at least once a year, next on April 1, 2026.

- We actively monitor changes in legislation, technology, and ethical standards as this is part of our customer offering as well.

- Updates are made as needed to ensure continued alignment with best practices and D-mærket requirements.

We also communicate our privacy-by-design strategies to our customers and suppliers via our website www.complianter.dk.

D-mærke spørgsmål: Kommunikerer virksomheden sine privacy-by-design strategier til sine brugere?

Reply: Yes, described above. We published this ethics policy online.

7. Changelog

This policy was formulated in April 2025 and approved by CEO, John Poulsen on the 21. Of April 2025.