Statement of the company's policy on data ethics, cf. section 99d of the Danish Financial Statements Act

This statement is part of the management report for cBrain's Annual Report for 2023.

cBrain emphasizes acting as a proper and responsible social actor.

As a supplier and partner for public companies at home and abroad, cBrain is in contact with vital societal data. This places great and stricter demands on cBrain's and the employees' ability to handle data correctly. It is important that cBrain's customers and the outside world can trust our handling of data. cBrain also processes data about the company's affairs as part of cBrain's internal operations.

cBrain's policy for data ethics supports this and is based on the keywords correct, responsible and transparent.

The data that cBrain and our customers use through our solutions can be both personally identifiable and non-personally identifiable nature. In our internal operations, this is administrative data such as customer and employee data including visitor data as well as data on investors, etc. In addition, data is used in connection with the development and support of cBrain's solutions. In relation to cBrain's customers, we encounter and process customers' data via cBrain's standard solutions for the market. This is typically data in connection with the public authorities' case processing.

Our attention to data ethics is particularly focused on our role as a provider of solutions to the public sector, because through this we can intentionally or unintentionally affect many people. We therefore have a responsibility to ensure that the solutions we provide are transparent and correct. In addition, that data is used in a way that is understandable and ethically correct.

cBrain's business is to provide solutions to the public sector based on the standard platform F2. The starting point for cBrain's data ethical considerations and efforts is therefore based on cBrain's product board, which sets the direction and framework for F2's product development. This is where it is ensured that F2 continues to emerge as a platform that enjoys great trust – also when it comes to ethics. The Product Board therefore has an important task of incorporating data ethics at an early stage in the development cycle. This applies not least in connection with decision support and automatic case processing, including the use of AI-based tools and algorithms.

The specific solutions for customers in the form of professional systems, etc. are configured in the company's Solutions Center, where solution designers and consultants configure F2 to the customer's specific needs. Here, it is the task of the project managers and solution designers to ensure that the necessary discussions about data ethics are taken with the customer and thus also raise the dilemmas that may arise.

Security is a natural part of working with data ethics. By its very nature, cBrain works with highly confidential data, which is why the level of security must be high. cBrain has been ISO 27001 certified since 2019 and is audited every year, just as an independent auditor prepares ISAE 3000 and 3402 statements for F2 use by customers.

In 2018, cBrain developed a Code of Conduct that all employees are trained in when they are hired. Similarly, all employees are trained in the company's security policy and procedures as well as data ethics. Every year there is follow-up training for all employees regarding the Code of Conduct, security conditions and data ethics. These end with a test that employees must pass. Where cBrain has attached permanent external consultants, they are also covered by the above.