itm8

Policy for Data Governance & Data Ethics

Background and purpose

The use of data is an integral part of the daily work of itm8 Group, and we strive to be fact-based and data-driven in our decisions. The purpose is to establish itm8 Group's approach to good data ethics and the principles that apply to how itm8 Group complies with applicable legislation for the area and processes data ethically, correctly, and responsibly. The use of data always takes place in respect of our social responsibility and in accordance with applicable law. This place demands on the way we register, maintain, process, and use our data. The policy for data governance and data ethics applies to the entire ITM8 Group.

Basic attitudes

Itm8 Group's processing of data is based on the following basic beliefs;

- ✓ Using data for fact-based decisions is a prerequisite for delivering an attractive product to customers and running an effective and credible business.
- ✓ The protection of our employees' personal data is an important and prioritized task and an important task as an employer.
- ✓ Data is an asset in the governance of itm8 Group, and we manage our data carefully according to its confidentiality, integrity and availability.
- ✓ Good data ethics go beyond the regulation that applies to the area, and we demonstrate social responsibility in our processing and use of data.
- ✓ Security measures must correspond to the sensitivity of the data being processed.
- ✓ Itm8 Group does not sell any data to any third party or take advantage of it in any unjustified or unintentional way.

The processing of data

We comply with our basic beliefs by:

- ✓ Make demands for ourselves and each other to be fact-based in our arguments and decisions.
- ✓ Be accurate in our records of data.
- ✓ Be meticulous in our processing of data to achieve a high data quality and ensure the validity of data.
- ✓ Not collect more data than we need and do not keep it longer than necessary.
- ✓ Ensure decentral anchored business ownership of data where data is best known and comply with the responsibilities that come with it as a local data owner.
- ✓ Prioritize our efforts – we have large amounts of data in itm8 Group, and we therefore focus on improving the data quality of the data we use in our business decisions.
- ✓ Classify and prioritize data according to different levels of sensitivity and confidentiality – and ensure that the subsequent processing of data reflects this.
- ✓ Process data in accordance with applicable compliance requirements – and ask if we are in doubt.
- ✓ Give high priority to the protection of personal data.
- ✓ Respect customers and employees' rights to their own data, and thus do not oppose disclosure and/or deletion

When choosing partners, we strive to ensure that our partners process data in the same way as we would ourselves and thus respect the same basic beliefs.

Principles of Good Data Ethics

Itm8 Group's principles of data ethics are;

Title

We do not use customers', employees', or partners' data without the necessary legal basis.

Transparency and predictability

When we collect data, we also commit to ensuring transparency about the subsequent use of data.

We process data in ways that are consistent with the intentions, expectations and understanding of the transferring party. Thus, for example, personal data may not be processed for new purposes that are incompatible with the purposes for which the personal data was originally collected, and data must not be used in ways that have unjustified negative effects on the data owner. In connection to this, Itm8 Group assesses whether the use of personal data can be justified objectively and that the processing is compatible with what can be expected in a free and democratic society and in accordance with human rights and applicable law, and our use of personal data must not discriminate against, for example, gender, race, ethnicity or communities.

Confidentiality

We protect personal data and protect it so that it does not end up in the wrong hands.

Proportionality

We never collect data unless the purpose is clear, and we always collect only the necessary data according to the purpose. We try to create as much value as possible from the data we collect.

Use of algorithms

We are particularly aware of the ethical challenges that may arise from the use of machine learning and algorithms and thus strive to ensure that decisions about the use of these technologies are made in conjunction with considerations regarding the remuneration of this policy.

Data security

Some of the companies in the itm8 Group are certified according to ISO/IEC27001:2013 and have ISAE 3402 Type II and ISAE 3000 Type II statements of assurance prepared. This helps to document that these companies meet and comply with the requirements for data protection, information security and good IT practice. For all companies in itm8 Group, processes have been initiated with the purpose of ensuring that the companies work according to the standards etc. that form the basis of the said certifications and declarations. Among other things, this is with the aim of preparing the entire itm8 Group for NIS2.

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