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# Data Ethics Policy 2024

Adform A/S

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# 1. Introduction

Adform A/S ("Adform" and/or "us", we") is a technology company, operating in the digital space within the fast evolving ad tech industry. We live in an age, where the digital world is evolving with unparallel haste, and continuously revealing new and innovative ways to improve online experiences and our lives, this underpins the big responsibility which follow from the digital transformation.

To have a "Future-Fit" organization is one of the strategic pillars in Adform's ESG Strategy. Data protection and ethical data processing is fundamental in ensuring adequate information governance both for our employees and clients. It is essential for our business continuity that we value and respect personal and non-personal data, and that we securely handled all such data.

With our Data Ethics Policy (the "Policy"), we wish to commit ourselves to high standards on how we process personal and non-personal data in a transparent manner, with the intention that this helps us articulate our values and thereby making them more visible to our customers, employees, and vendors.

# 2. Purpose

The purpose of this Policy is to formally state Adform's data ethics principles and describe the overall ways on how we process data, making it clear to our clients, employees, and other stakeholders that we are dedicated in protecting and processing their data to the highest ethical and security standards.

# 3. Adform's Data Ethics Principles, Products and Processes

Adform has seven (7) guiding principles, where Adform's principle #2 is "Behave with Decency". This principle entails that Adform want all employees to be respectful, fair and act with integrity towards clients, suppliers, and colleagues. This principle is taken into account, when looking at how Adform operate, both in regard to our core business as an advertising technology platform, and when engaging with our employees, job applicants and vendors.

At Adform, we process large amounts of data on behalf of our customers and also within our own organization and business operations.

Data protection and information security have always been a fundamental part of Adform's business, as it is of great importance to us that our customers and employees always feel safe when entrusting us with their data.
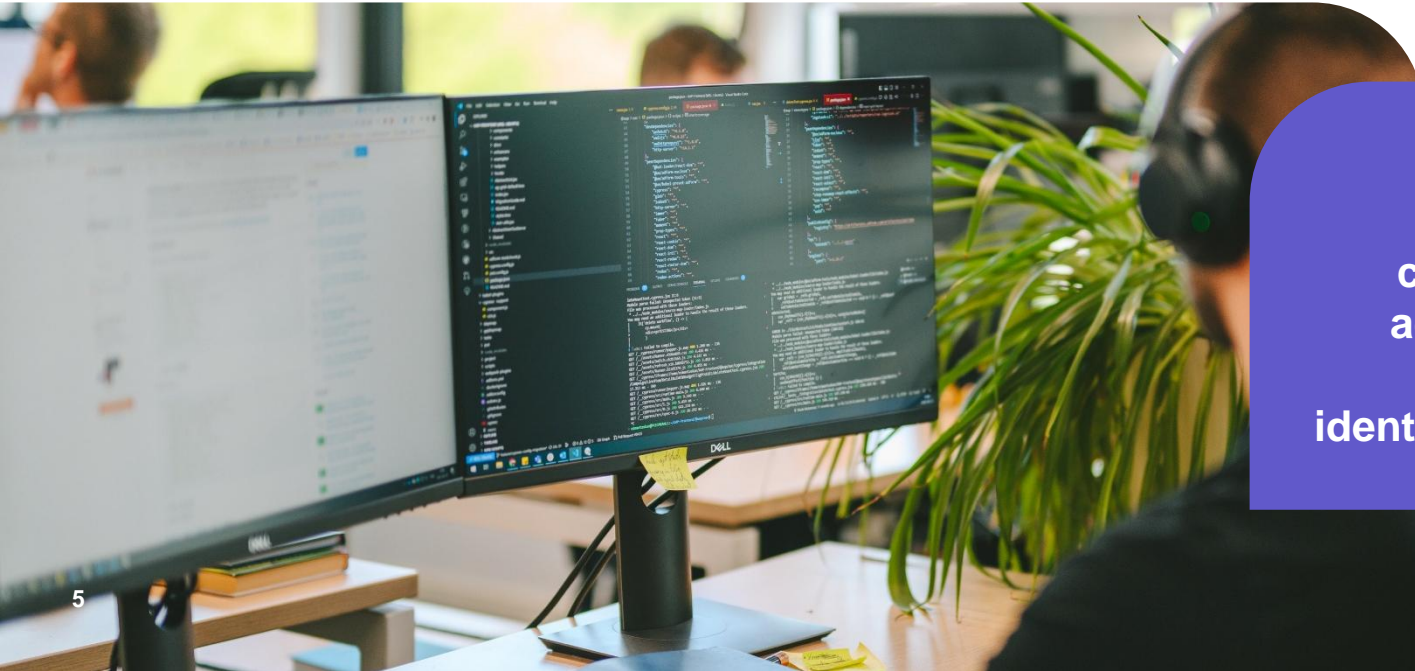
Below we have described Adform's approach to data handling, in respect of our products, our people and how we approach security, artificial intelligence ("AI") and upcoming legislation.

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### 3.1 Our Products

Being a provider of an advertising technology platform, Adform help advertisers and agency clients to use their advertising budget to increase their sales efforts or brand awareness activities, and Adform' publisher clients to monetize their public-facing digital properties (website, mobile, apps). As a part of this effort, our clients use either their own 1st party cookies or Adform's 3rd party cookies (or a combination thereof) and in this process Adform's advertising platform helps facilitate delivery of the relevant message, to the right audience, at the relevant moment.

Adform does not knowingly collect personal data nor does it allow our customers to collect data via Adform's advertising technology platform that is considered directly identifiable personal data or sensitive data, such as an individual's name, email address, addresses, phone number, social security number, credit card number, health data, sexual orientation or religion. Further, we contractually oblige all clients not to transfer such personal data onto our advertising technology platform. Adform does collect and store (truncated) IP addresses, (truncated) geo-location data and unique identifiers placed electronically on a person's device and other information which is somewhat integrated first party data (e.g. shopping history, geography and device information) within our data management platform (DMP).

The data we collect come from all European countries or globally when end-users enable it, e.g. via cookies, software development kits and similar technology. Towards the end-users, Adform can act both as a processor for our customers, be a joint controller and/or be a controller, depending on which services are enabled by our customers in Adform's advertising platform and how the personal data is processed as a result thereof. Adform treats all cookie data and data related to other identifiers as personal data.

**Adform does not knowingly collect personal data nor does it allow our customers to collect data via Adform's advertising technology platform that is traditionally considered directly identifiable personal data or sensitive data**

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**3.2 Our People**

In regard to Adform's employees and job applicants, we process personal data. This personal data includes regular personal data, such as, names, addresses, email addresses and phone numbers, whereas special categories of personal data, may also be included e.g., relating to health information, bank details, information about next of kin, children etc. as necessary to ensure Adform can provide appropriate benefits to employees.

**3.3 Processes**

Adform process Adform process all data with respect, taking into account the sensitivity of the data and considering all relevant privacy rights to make sure we earn the trust of our clients, employees, shareholders, vendors and any other stakeholders.

In order to secure compliance and transparency towards end users, Adform have a dedicated privacy department, who focus on supervising and ensuring that all newly developed platform features are reviewed from a compliance perspective. The privacy department also ensure that Adform's dedicated "Privacy Center" - the external facing privacy hub on www.adform.com continues to remain up-to-date and compliant. Further, the privacy department is embedded into all new product developments, and ensure that upcoming compliance (e.g. AI compliance, DSA, NIS II) is addressed accordingly. The privacy department also ensure that Adform's processes in respect of our employees are complied with and communicated in dedicated policies to current and prospective employees.

We have a number of comprehensive GDPR and Privacy training programs in Adform. The training courses are mandatory for all employees to complete, and are available via Adform's internal training system (LearnAdform) such that all employees can participate in an easy and scalable manner. All new employees also get familiar with these training, and the process is set up in such a way that when new employees join the Adform group they will be required to complete the training programs within the first three months of their employment. Morever, Adform has implemented department specific privacy training, such as those for human resources and the revenue and operations department.

**3.4 Information Security**

Security is a part of the foundation to ensure that Adform from a technical and organizational perspective does data processing in a compliant and ethical manner. Adform's daily operations are based on a robust security policy and with well-defined organizational procedures, all of which comply with the international security standard ISO/ IEC 27001, which are independently audited by an external auditor, to ensure ongoing compliance and effectiveness.

In addition to these fundamental measures, Adform uses advanced techniques to ensure data protection. With network segmentation and firewalls, equipped with intrusion detection systems (IDS) and deep packet inspection (DPI), we have a defense against unauthorized access and threats. Our firewalls act as gatekeepers, controlling and monitoring the flow of data to maintain our information's integrity.

In parallel, our endpoint protection tools form a critical layer in our security infrastructure. In synergy with our firewall monitoring, end point protection enable us to proactively investigate incidents. This approach to security ensures that we not only respond to threats but also neutralize them effectively.

Adform has a dedicated risk committee which oversees the risk management process, is responsible for final decision-making and is accountable for risk management within Adform. Alongside the risk committee, leadership meets quarterly with the security team to track progress on highest priorities. All to continuously strengthen the robustness and ensure that Adform is working proactively with the appropriate security focus.

Finally, we ensure the availability and resilience of our data by securely housing it in our own data servers. This choice enables us to maintain high availability standards, even in the unlikely event of technical failures.

**Adform's daily operations are based on a robust security policy and with well-defined organizational procedures, all of which comply with the international security standard ISO/ IEC 27001**

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**3.5 Artificial intelligence, Governance and Controls:**

Adform use artificial intelligence ("AI") and machine learning as a part of our advertising technology platform. Machine learning (as a subset of AI) is an algorithm or sets of algorithms that processes and analyses aggregated personal or non-personal data in order to recognize certain patterns or predict certain behaviors in order to maximize a particular function feature or result. Adform's machine learning algorithms shall be seen as a type of supervised learning where Adform (as the supervisor) controls and limits the data sets that are made available to the machine learning algorithm for the purpose of prediction of certain behaviors or the likelihood of certain behaviors.

Adform does not use machine learning for the purpose of unsupervised learning where the result would be something entirely new and where the machine learning algorithm will have access to an unlimited amount of data sets leaving it at the discretion of the machine learning algorithm to learn and deliver results on its own.

As tools that are powered by AI driven technologies are more and more becoming indispensable in executing certain tasks used by various departments across Adform, we have launched a dedicated AI policy in 2023 ("AI Policy"). The AI Policy provides guidance, rules and prohibitions on which AI tools are permitted and under which circumstances and requirements.

The AI Policy relies on general principles such as data ethics, fairness, data protection, privacy and security and confidentiality. Similarly to the GDPR and privacy trainings, Adform has a mandatory AI course which all employees are to complete in our internal training system (LearnAdform).

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**3.6 Additional regulations within Adform's sphere**

Adform's privacy department is responsible for monitoring new regulations and laws as they get enacted, to ensure Adform can prepare and implement them, where they are applicable to Adform or in support of our customers, in due time before they enter into effect.

There are many examples hereof coming from particular the EU, for instance the Data Services Act (DSA), DORA and NIS II which are additional sources of legislation that require businesses to subscribe and abide by enhanced transparency, accountability and security principles. Adform is committed to ensure support to the online platforms that are using Adform's services.

# 4. Approval

This data ethics policy has been approved by Adform's board of directors on March 27 2025, pursuant to section 99d of the Danish Financial Statement Act (årsregnskabsloven).