

adform

DATA ETHICS POLICY

Adform A/S

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1. Introduction

1. 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 unparalleled haste, and continuously revealing new and innovative ways to improve our lives, this underpins the big responsibility which follow from the digital transformation.
2. Data protection and ethical data processing is fundamental in any modern society, and we must value and respect all types of data. This include both personal data as well as other types of data.
3. 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.
4. This Policy is an integral part of the management report in Adform A/S’s Annual Report for the calendar year 2022. The Policy constitutes the statutory statement of social responsibility, cf. section 99d of the Danish Financial Statements Act for the financial year 2022

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 customers, employees, and other stakeholders that we are dedicated in protecting and processing their data to the highest ethical 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 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 may always feel safe when entrusting us with their data.

On the following pages we have described Adform's approach to data handling, in respect of our products, our people and how we approach security and artificial intelligence ("AI").

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 customers 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 traditionally considered directly identifiable personal data or sensitive data, such as an individual's name, email address, addresses, phone number, social security number, or credit card number, health data, sexual orientation or religion. Further, we contractually obliges all customers not to transfer such directly identifiable 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 its customers, be a joint controller and/or be a controller, depending on which services are enabled by our customers in Adform's advertising platform. 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



3.2 Our People

In regards to Adform's employees and job applicants, we process personal data. This personal data includes regular personal data, such as, names, 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., to ensure Adform can provide appropriate benefits to employees.

3.3 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 customers, employees, shareholders, vendors and any other stakeholders.

In order to secure compliance and transparency towards end users, Adform have a dedicated function within its legal department, who focus on supervising and ensuring that all newly developed platform features are reviewed from a compliance perspective, and to ensure that Adform's dedicated "Privacy Center" on www.adform.com continues to remain up-to-date and compliant.

A comprehensive GDPR and Privacy training program was rolled out in Q2 of 2022 related to data privacy. The training course is mandatory for all employees to complete, and as we made it available via Adform's internal training system (LearnAdform), all employees can participate in an easy and scalable manner. All new employees also get familiar with training, as a process has been setup to ensure that when new employees join the Adform group they will all be required to complete the training program within the first three months of their employment.



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

3.4 Security

Security of data is an important part 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 detailed security policy and organizational procedures, all of which comply with the international security standard ISO/ IEC 27001, which bi-annually are independently audited by an external auditor.

In addition to these measures, Adform have all data securely stored at our owned data centers to ensure that data availability is always upheld in the unlikely event of technical failures.





3.5 Artificial intelligence (“AI”)

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.

4. Approval

This data ethics policy has been approved by Adform’s board of directors on 30 March 2023, pursuant to section 99d of the Danish Financial Statement Act (årsregnskabsloven).