KMD Data Ethics Policy

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Policy owner: Lead Sustainability Officer

Responsible office: Strategy, Technology & Communications/ Corporate Sustainability

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1 Purpose and summary

KMD believes in ethical conduct throughout our business. Data are among our most valued assets and we take pride in digitizing and operating data in our solutions with data ethics in mind.

Data ethical considerations are a prerequisite when our business involves data processing for public authorities and private companies, particularly when the data processing affects people's everyday lives. It becomes even more relevant when the data processing also includes data science and artificial intelligence in forms such as machine learning and biometrics, since the data then form the foundation for algorithms that learn from historic data. Having the right ethical mindset will enable the potential to learn from data, at the same time as observing and mitigating the potential risks.

KMD wants to act responsibly and ensure that we do not contribute to discrimination or inequality through our use of data.

2 Scope

_ Data ethics impacts every employee at KMD as well as KMD's customers, suppliers, partners and users of our systems. Ultimately, our data ethics impacts everyone who uses a KMD solution or whose data are processed by a KMD solution.

_ Data ethics impacts the way we develop our solutions and the way we act regarding data in our everyday business activities.

3 Definitions

Definition	Description
Data ethics	Data ethics encompasses the moral obligations of gathering, protecting and using personally identifiable information and how it affects individuals
AI	Artificial Intelligence

4 Policy statements

KMD believes in ethical conduct throughout our business. Data are among our most valued assets and we take pride in digitizing and operating data in our solutions with data ethics in mind.

Data ethical considerations are a prerequisite when our business involves data processing for public authorities and private companies, particularly when the data processing affects people's everyday lives. It becomes even more relevant when working on the development and deployment of new emerging technologies such as artificial intelligence and biometrics — technologies regarding which we may not yet have a full picture of the risks and potential.

Fundamental data ethical statements
_ KMD wants to act responsibly and ensure that we do not contribute to discrimination or inequality through our use of data.

_ Respect for privacy is fundamental in data ethics. However, we regard data ethics as being more far-reaching than general data protection and data security matters.

_ KMD is committed to leveraging the advantages of emerging technologies and data accessibility to benefit society through our solutions.

_ At KMD, we consider it part of our responsibility as a technological frontrunner to provide knowledge and feedback to the authorities regarding new ethics guidelines and legislation.

Responsibility
Every employee at KMD has a responsibility to treat data in an ethically correct way. Our employees' contributions and commitment to responsible and ethical data processing are a prerequisite in maintaining the high degree of trust KMD's customers and society have in us. Every employee at KMD undergoes mandatory training in how to process personal data correctly. At KMD, we support a positive work environment, where openness regarding mistakes leads to learning from them.

We encourage our employees, customers and users to challenge the ethical stamina of the data in our solutions and to speak up if something does not seem right. They can do so by speaking to their manager or business partner or via the KMD Whistleblower Arrangement.

KMD also requires our suppliers to treat data in an ethically responsible way. We strive to ensure that our suppliers contribute to the high degree of trust in the treatment and processing of data at KMD.

Data ethics is not just about restricting access to data — data can also contribute positively to society. We see it as our social responsibility to cooperate with the authorities and provide data to the public authorities on request.

Data ethical principles
When we process data and develop solutions, it is vital to ensure that we live up to our data ethical values. We therefore apply these four data ethical principles, which each need to be met:

Human dignity: The data processing should respect human dignity.

Anti-discrimination and bias: The data processing should inhibit discrimination of individuals or population groups and minimize the effect of undesired bias on the data sets.

Supporting transparency: The data processing should support the principle of transparency so that relevant processes can be explained, including when AI or machine learning is utilized.

Rights of individuals: The protection of natural persons in relation to the processing of personal data is a fundamental right. The processing of personal data should be designed to serve mankind. The right to the protection of personal data is not an absolute right — it must be considered in relation to its function in society and be balanced against other fundamental rights, in accordance with the principle of proportionality. KMD strives to achieve this balance when processing data and developing solutions.

5 Roles and responsibilities

The Corporate Sustainability Board has overall responsibility for the Data Ethics Policy. The Corporate Sustainability department is responsible for maintaining and updating the policy and governance. The policy is developed by a dedicated task force with representatives from Group Legal, Group Security, Office of Technology and R&D.

R&D is responsible for the development and deployment of the Data Ethics Questionnaire and guidelines.

KMD

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