

# Data Ethics Policy



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# Data Ethics Policy

## Introduction

This Data Ethics Policy outlines Columbus's commitment to manage data with a high level of integrity. The overall objective of this Policy is to encourage and motivate all employees of Columbus to manage data with the utmost care and respect and to responsibly take part in ensuring that the Group meets its ambitious standards in this regard.

With our Data Ethics Policy, we wish to commit ourselves to a higher standard on how we process data, which is not only legally compliant, but also abides by our ethical values and morals. It is our sincere hope that with this Data Ethics Policy we may articulate our values and morals making them more visible to our customers, employees, and business partners, subsequently facilitating an even greater integration between our IT solutions and services and the right to privacy of any individuals whose data we process.

## Purpose

The purpose of this Data Ethics Policy is to establish high standards for data ethics that Columbus A/S group wishes to adhere to and to emphasize our commitment to a responsible and sustainable use of data, and to account for our general data collection and use in order to ensure transparency. Columbus will periodically review and revise the

principles to reflect evolving technologies, the regulatory landscape, stakeholder expectations, and understanding of the risks and benefits to individuals and society of data use.

## Data we use and process

Columbus uses and processes data, which can be both personal data and non-personal data.

The personal data we collect and use as controllers are primarily contact details on our customers and their employees to be able to deliver our consultancy services and internal data regarding our own employees for administrative purposes. In addition, we also collect data from our webpages and other portals regarding the visitor behavior for marketing and statistical purposes. We also buy data for direct marketing purposes.

In addition hereto, we process data on behalf of our customers as data processors in connection with delivery of our consultancy services. In such cases, we always enter into a Data Processing Agreement (DPA) and we only process according to instructions from the customer.

## How we collect data

- **Direct Collection:** From customers during account creation and consultancy service delivery.

- **Third-Party Sources:** Data from partners to enhance customer service.
- **Web and Media:** Data from our website and other media platforms.
- **Purchased Data:** Occasionally acquired from trusted marketing data providers.

## Principles

- Columbus A/S complies with both Danish and EU law on data and privacy and protection. We do not exploit data to target, or help companies target, vulnerable individuals.
- Columbus perceives data ethics considerations as more far reaching than compliance with the law. It is our greatest hope and accomplishment to earn and uphold the trust of the people whose personal data we process, whether this is done in our role as data controller or data processor.
- It is always part of our data security considerations what type of data we are processing, as the security measures must correspond to the sensitivity of the data being processed.
- Data and information security have always been a fundamental part of Columbus' business, as it is of great importance to us that our customers and employees always feel safe when entrusting us with their data.

- Economical profit or any other material benefit may never override the fundamental rights and safety of an Individual data.
- We follow the international Information Security standard of ISO/IEC 27001 Security is and always has been a top priority to Columbus and will perpetually continue to be so in the future.
- All our employees are continuously and thoroughly trained in Columbus' methodology, which embodies data protection security through a complete set of guidelines, tools and templates for planning, delivering, managing, and documenting complex integrated IT solutions.
- Columbus does not sell any data to any third party or profit from it in any other way.
- Our Data Ethics initiatives and reporting is organisationally anchored with our Information Security Governance Team and our Legal Department.

## Use of computer programs, artificial intelligence and algorithms

Columbus currently does not deploy artificial intelligence or algorithms for day-to-day operations. However, consulting is at the core of our business, and we may support or offer such technologies as part of client services.



In such cases:

- All activities will comply with the client's policies and procedures.
- Ethical considerations will be paramount, ensuring alignment with this policy and client expectations.

As part of our commitment to innovation, Columbus continues to evaluate emerging technologies. If AI or algorithmic tools are integrated into our operations, this policy will be revised to reflect the changes.

#### **Transparency and privacy**

For further details on how Columbus ensures data privacy, please refer to our comprehensive Privacy Policy:  
<https://www.columbusglobal.com/en/privacy-policy>

#### **Review**

The Board of Directors will annually review and, if relevant, update the Policy.

Reviewed and approved by the Board of Directors on 10 December 2025.

# Columbus®

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