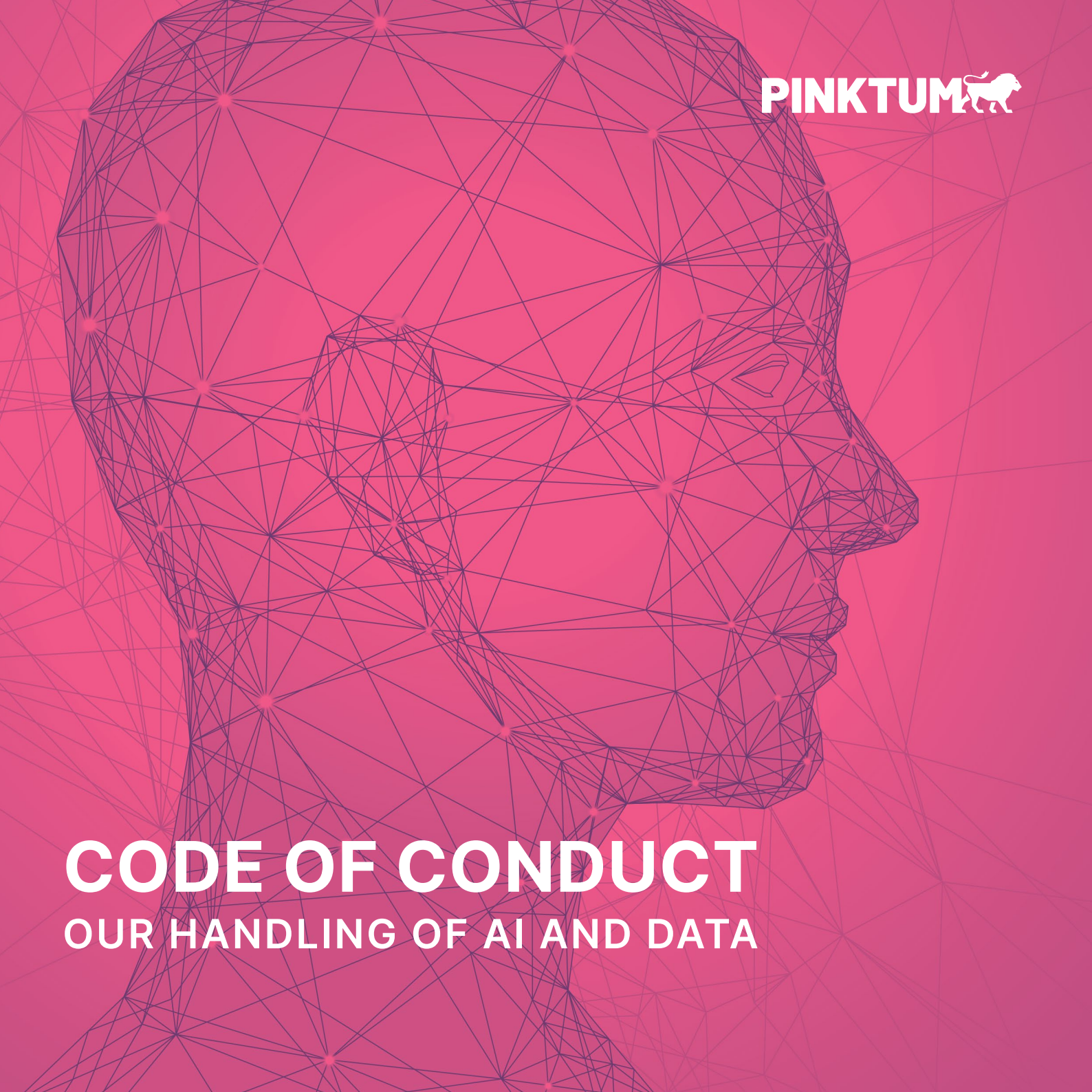

CODE OF CONDUCT

OUR HANDLING OF AI AND DATA

For the good of man

In the digital world as well as in digital products, many data points are created which then can be processed. This also applies to modern learning environments that focus on the development of the individual. This way data processing can support the individual advancement of learners.

We see much potential for using technological development for the benefit of mankind. Our development, implementation and use of AI systems are guided by ethical and social considerations. The premise of all activities is to use AI technologies in accordance with social values, legal norms, the principles stated in this document and moral considerations.

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The person at the center

As a digital HR development company, people are always our focus. We therefore use data with the goal of helping people develop and to better understand learners. For our customers, we can tailor measures precisely to the development needs of each individual employee. We use learner data and artificial intelligence to individualize learning opportunities. We adhere to the following guidelines for handling artificial intelligence and data:

1. Security

Data security and data protection are our top priority. We ensure that data is always and exclusively handled securely, confidentially and, whenever possible, anonymously. We have conducted a risk analysis for every process which uses AI. The well-being of the learners is always our main focus.

2. Success

We explain how we integrate AI and data into our processes to our customers and employees. We also make this transparent to our users. We are guided by the principle of 'Explainable AI', where machine learning models and decision-making processes are designed to be understandable and comprehensible to humans.

3. Orientation

We always act in accordance with the values defined in our code of conduct and the ethical principles of the European Commission. We use AI and data to improve the quality and efficiency of our work for our customers and employees.

4. Data minimisation

We follow the principle of data minimisation and collect, store and only use the data that is absolutely necessary for the optimal support of the learners. This is how we keep the amount and scope of personal data to a minimum. We securely delete or completely anonymize data that no longer serves this purpose.

5. Fairness

We ensure that our AI models are fair and unbiased and do not produce discriminatory results.

6. Privacy

The highest level of privacy is our standard. We work with protocols and access rights to define who can see and process what level of data, and keep the number of these people as low as possible.

7. Rule conformity

We comply with the laws and regulations in force in the EU and in the respective country regarding the handling of data and AI (DSGVO). The responsibilities for this are always clearly defined and transparent. Human action and supervision always take precedence over technology. For us, the laws and regulations are the basis upon which we work and with which we add further procedures to our code of conduct.

8. Continuing education

Just as AI is constantly evolving, we remain current in training our employees on how to use it ethically. We continuously invest in training and raising awareness among our employees on how to deal with AI and data to ensure they adhere to ethical standards.

9. Stability

We test the AI systems for stability and reliability. The technical robustness of our systems has the highest priority. This applies to both the repro-ducibility and reliability of the output.

10. Up-to-dateness

We regularly review and update our data and AI policies to ensure we maintain the highest ethical standards.

About PINKTUM

PINKTUM is one of the leading providers for the lasting and effective development of soft skills. As part of the digital learning, customers have access to an international award-winning online library of approximately 600 video-based, interactive e-trainings, which are available in several culturally adapted languages. An in-house research institute provides up-to-date findings for optimized personnel development.

PINKTUM is the brand name of Pink University GmbH, which was founded in 2010 and currently has more than 150 employees at 16 locations worldwide. Joachim Pawlik is the CEO. The company's headquarters are located in Hamburg and Munich. The company is part of the PAWLIK Group.

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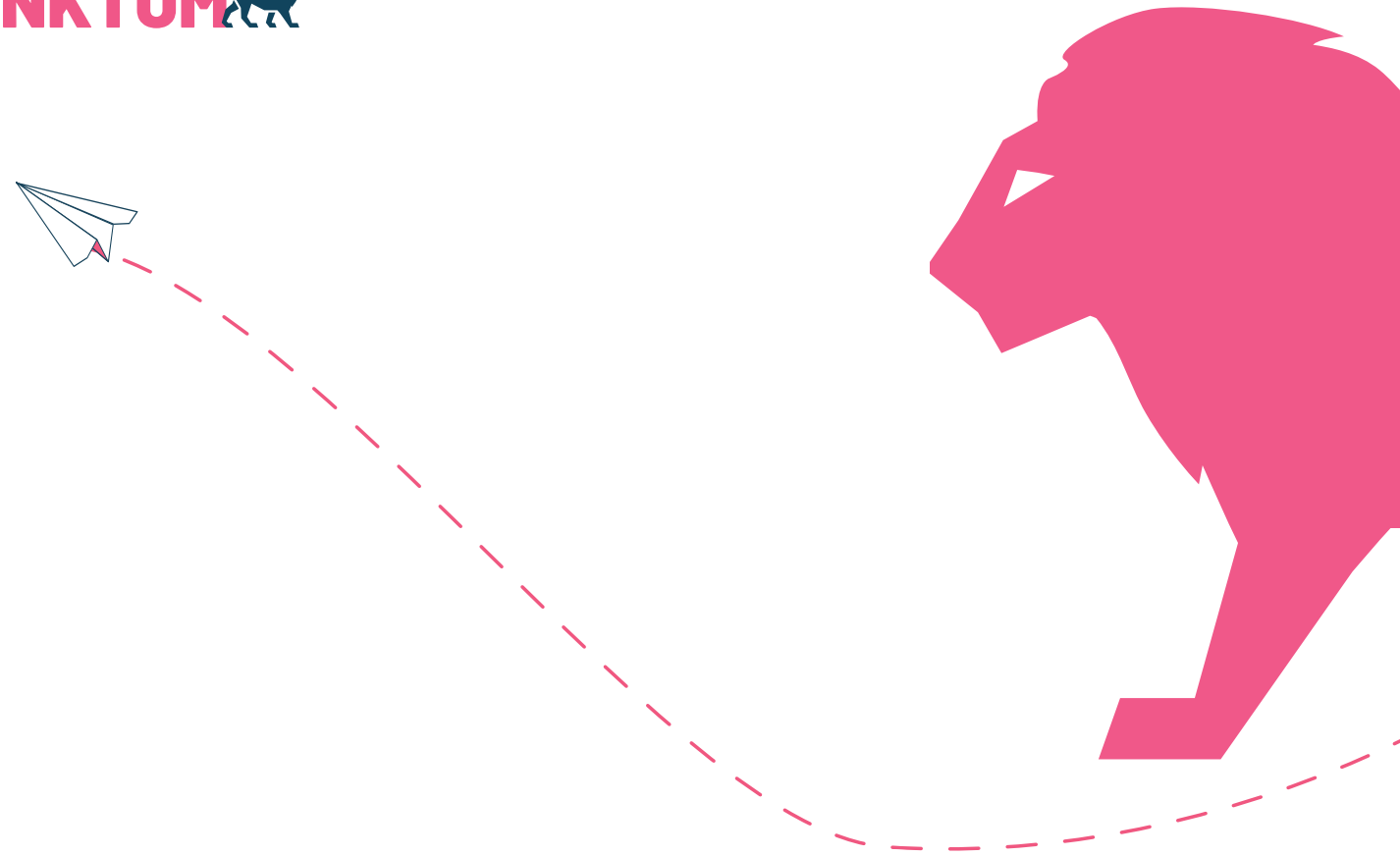

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