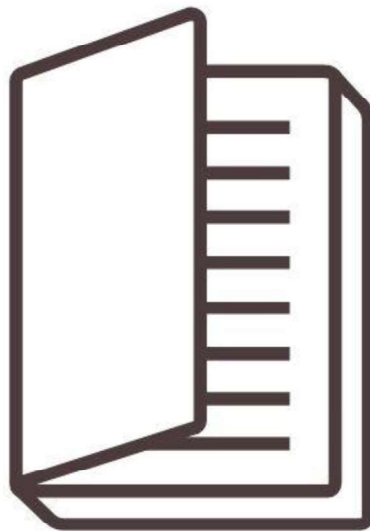# Oterra Group
# Data Ethics Policy



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# Introduction

We live in an age, where digital development is evolving and continuously revealing new and innovative ways of improving the operations of our company. However, with all the possibilities of a digital transformation comes responsibilities and an important focus on data ethics. Oterra is committed to the protection of privacy and to securing a transparent and ethical data processing.

This Data Ethics Policy has been prepared in accordance with §99d of the Danish Financial Statements Act.

# Purpose

The purpose of this policy is to formally state Oterra's data ethics principles and describe the overall ways we process data, making it clear to our customers, suppliers, employees, visitors to our website, and other stakeholders, that we are dedicated to protecting their data. It is essential that these parties and the outside world trust our way of using data. This Policy is supplemented by our Privacy Policy and Cookie Declarations.

This Data Ethics Policy applies to all companies in the Oterra Group.

# Our Data Ethics Principles

In Oterra, we acknowledge that data is a valuable asset and should be treated with conscientiousness and respect.  Oterra's Data Ethics Principles are embodied in three key principles: security, trust, and integrity.

### Security
The security of data is important to us. To safeguard high ethical data standards, Oterra ensures appropriate technical and organizational security measures are implemented on our website and corporate IT-systems to prevent accidental or unlawful destruction, accidental loss, alteration or change and unauthorized disclosure of or access to data.

### Trust
Trust is an essential part of any relationship, and the trust of our customers, suppliers, employees, shareholders, and other stakeholders is key to our success as a company. Trust is earned over time and it is built with consistency between what is said and what is done and always based on transparency. Our activities must make sense for those whose data we

collect and process, and we recognize that an increased use of data should go hand in hand with an increased level of transparency in order to gain trust. Data should be collected and used in ways that are consistent with the intentions and understanding of the individuals.

We have been entrusted with personal data, but it does not belong to us. That is why we will not sell personal data, with which we have been entrusted with, to third parties for their own individual commercial use.

### Integrity

To Oterra, the integrity of the way we use data is important. In that regard, Oterra considers whether the use of personal information can be justified, and that processing is compatible with what can be expected in a free and democratic society and in accordance with human rights. Economical profit or any other material benefits of using data may never override the fundamental rights and safety of an individual, including protection of privacy.

## Data processing in Oterra

Data is an important asset for our business. We process personal data about our current, potential, and former employees, business contacts and stakeholders, as well as website users. Such data is primarily collected directly from the data subjects, but also from other sources such as public databases, joint marketing partners, and social media platforms, as well as other third parties. Personal data is processed and handled in accordance with applicable rules and regulations, including GDPR.

We also process large amounts of data that is not personally identifiable e.g., aggregated data, technical data, statistical data, industrial data, or similar. Such data is used to improve performance and reliability of our products and increase the productivity for the benefit of our customers.

## Use of Artificial Intelligence

If we use machine learning, artificial intelligence, or algorithms ("AI Systems"), we strive to ensure that the systems are designed and utilized with the idea that the use of AI needs to respect the rights and dignity of people and that the results are not discriminatory or biased.

AI systems should be deployed with an appropriate level of human control and oversight, based on the assessed risk to individuals. Where there is a potential for direct and significant

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impact on individuals because of deploying AI, AI should not be given complete autonomy in decision making.

Privacy and security should be considered as part of the design of any AI system by implementing adequate measures to mitigate risks to the privacy, security, and safety of individuals.

## Our organizational anchoring of Data Ethics

Oterra believes data ethics are important and should be anchored at the top of our organization. As a result, the Board of Directors is responsible for approving this Policy and will assess on an ongoing basis, and at least once a year, whether updates to the Policy are necessary.

This Data Ethics Policy has last been reviewed and approved by the Board of Directors on 27 June 2025.

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