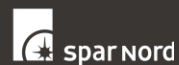


Spar Nord Bank

Data ethics policy



1. Purpose and vision

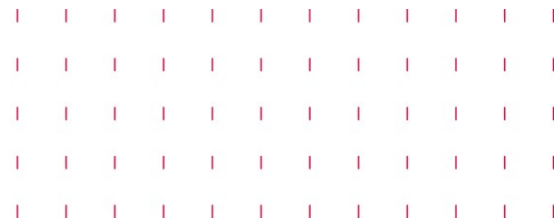
The purpose of Spar Nord Bank's the data ethics policy is to establish common principles and a common practice for ethically appropriate collection, processing and deletion of data by the bank, and for ethically appropriate use of artificial intelligence (AI) by the bank, now and in the future.

The vision is that, in line with the bank's values, Spar Nord Bank is to be trustworthy and reliable with regard to data ethics. By being transparent and acting responsibly, Spar Nord Bank will ensure that all customers are treated equally and appropriately in all regards, and that the bank adheres to a "people before business" approach. In other words, we will manage the personal data of other people in the same way we would want others to manage our own personal data.

2. Definition of data ethics

Data ethics is about people and their data and it is about what is appropriate when dealing with this data. In line with the bank's values, data ethics at Spar Nord Bank is about being trustworthy and acting responsibly when managing the personal data of customers. The bank will design data processes that are sustainable and that most importantly benefit people.

Data ethics is about abiding by the values and principles underlying human rights and the General Data Protection Regulation (GDPR). It is about honest and transparent processing of data, and it is about developing privacy-by-design data processing solutions and privacy-enhancing products and arrangements.



Data ethics builds on the values in the General Data Protection Regulation (GDPR), and therefore, as a minimum, data processes must comply with the requirements in the regulation.

3. Scope

The policy applies to everyone who processes personal data in the Spar Nord Bank Group and for everyone who processes personal data on behalf of the Spar Nord Bank Group. This data ethics policy is a supplement to existing GDPR rules, and it must guide and inform all data-related processes deemed relevant in terms of the data ethical principles. The data ethics principles are relevant to all work involving personal data: whether it be the personal data of employees or of customers. Therefore, the principles apply to all data-related processes and to everyone involved in carrying out these processes.

4. Data ethics principles

The bank has five fundamental data ethics principles. These five principles reflect the core values in all data-related processes. This means that, regardless of the data process in question, the bank will comply with these principles.

4.1 People first

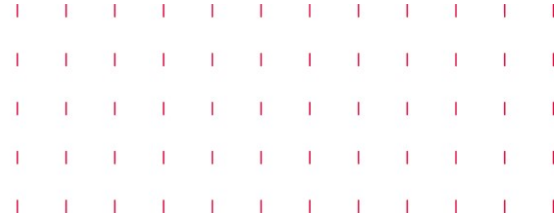
Spar Bank Nord recognises that certain human rights are involved when it comes to the use of personal data, irrespective of whether the data belong to customers or employees. In other words, people should be come before any machine, process or commercial interest in the bank. People should be the primary focus and should be the primary beneficiaries of the bank's data processing activities.

4.2 Individual data control

Everyone is their own person and has control over their own unique set of data. Every person registered in the bank's IT systems has the right to have their data rectified and control their own data in all regards as long as this does not conflict with the bank's obligation to comply with other legislation.

4.3 Transparency

Every person is entitled to transparency when it comes to their own data and the use of this data. Therefore, everyone registered in any of the bank's systems is entitled to seek access to the personal data registered about them by the bank, and also has the right to ask to be informed about how this data is being processed and for what purposes. This right is also secured by the General Data Protection Regulation and therefore complies with the rules in the GDPR.



4.4 Responsibility

The bank manages the personal data of all people in the same responsible and trustworthy way we would want others to manage our own personal data. The bank achieves this through reflective, reasonable and systematic data protection measures. Acting responsibly must be an integral part of all aspects of data processing in the bank, so as to reduce the risks for the individual, and to mitigate social and ethical implications.

4.5 Equality

The bank believes that equality is a cornerstone of democratic and fair treatment of people and their data. Data processes must therefore be based on an awareness of the societal power balances maintained, reproduced and generated by data systems. Special emphasis is therefore on protecting people who are particularly vulnerable to profiling that could restrict their possibility for self-determination and control or expose them to discrimination or stigmatisation on grounds of their social or health status.

The Bank offers financial products to a customer based on an assessment of the customer's individual financial situation, because no one should be offered a product they might not be able to afford. In these situations, the bank therefore has a statutory basis for treating customers differently on the basis of their financial situation to ensure the individual customer receives proper counselling and treatment that promotes healthy finances for the individual as well as for society as a whole.

5. Organisation - roles and responsibilities

5.1 Executive Board

The Executive Board of Spar Nord Bank is responsible for approving the bank's data ethics policy and for ensuring compliance with the policy. Furthermore, the Executive Board is responsible for reporting on data ethics in the bank's annual management's report in connection with the annual financial statements for the Spar Nord Bank Group.

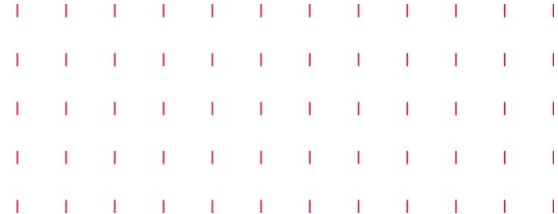
5.2 Legal department

The legal department is responsible for interpretation and implementation of the data protection rules. The regulations are essential for the bank in abiding with the data ethics principles. Therefore the legal department has an important responsibility with regard to the bank's objective of being a responsible bank. Furthermore, the legal department is the owner of the process for carrying out GDPR risk assessment, in which data ethics is a separate element. This means the legal department is responsible for the process to ensure that data ethics are taken into account whenever a new system or a new process is put into use or changed.

The legal department is responsible for designing and continuously updating the bank's data ethics principles, making agreements with data owners on implementation of the principles, as well as raising awareness about data ethics and the data ethics principles throughout the bank. The legal department is also responsible for supervising ongoing implementation of the principles in the organisation.

5.4 Departments working with IT development

The bank's development departments, including the IT development department under the IT department, and other departments working with the development or



procurement of new IT solutions, are responsible for developing or buying solutions that live up to the data ethics principles presented in this policy. This responsibility entails that developers remember to draw attention to the data ethical concerns, including drawing attention to any unanswered data ethical concerns pertaining to already developed or procured solutions.

5.5 Business development

The business development department is responsible for ensuring that all new solutions and products used by Spar Nord Bank comply with the data ethics principles. Solutions and products must conform with the data ethics principles, irrespective of whether they involve new ways to obtain, use or manipulate data, or they involve the use of artificial intelligence (AI).

5.6 Departments working with IT solutions

All employees in all departments in which either analogue or digital personal data is used will be continuously reminded of their responsibility to abide with the data ethics principles. This responsibility regarding the data ethics principles applies to situations involving customer contact/processing as well as situations involving employees and cooperation partners of the bank.

6. Implementation and control of the data ethics policy

6.1 Ensuring compliance with data ethics principles

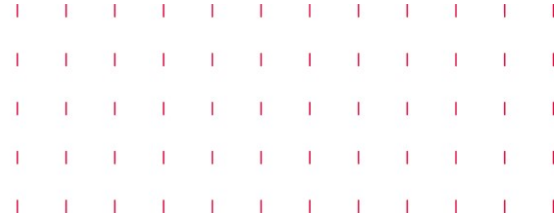
Knowledge of and compliance with data ethics principles is ensured through continuous training of bank employees. Continuous training is primarily through awareness-raising activities in relation to data protection.

Knowledge of data ethics is also ensured through other data governance and data protection assignments in the bank.

6.2 Mechanisms to support data ethics

The bank has a number of measures to support the data ethics principles.

- When using automated decision-making, e.g. in connection with loans, it must always be possible to arrive at a decision based on a human assessment that is more favourable for the customer than the automatic decision. This ensures that decisions concerning humans are made by humans. This applies to all situations involving automated decision-making processes.
- Compliance with the data ethics principles must always be considered when procuring, developing or changing new as well as existing IT systems. This is through the bank's GDPR risk assessment, the objective of which is to assess the suitability of new and existing IT systems and data-related processes in terms of GDPR and data ethics compliance.
- Furthermore, compliance with the data ethics principles must also be considered when creating or changing new or existing data-related processes. This is through



the bank's GDPR risk assessment, the objective of which is to assess the suitability of new and existing IT systems and data-related processes in terms of GDPR and data ethics compliance.

7. Reporting

Data ethics reporting is part of the half-yearly GDPR compliance reporting to the Executive Board. Reporting includes any registered incidents related to the controls mentioned above that conflict with Spar Nord Bank's data ethics principles. The reporting is included in the DPO's half-yearly report to the Executive Board.

Reporting on data ethics is also included in the Bank's annual CSR reporting, which is published with the annual report.

8. Approval and update

Spar Nord Bank's data ethics policy is reviewed and updated as a minimum once a year. The policy is owned by Karin Duerlund, head of the legal department at Spar Nord Bank, and operational responsibility for revision of the policy lies with the legal department.

The data ethics policy is approved annually by the Executive Board along with the bank's data protection policy.

This policy was approved by the Executive Board with entry into force in October 2022.