Esoft Data Ethics policy

Content

1. Introduction

This Data Ethics Policy is a result of Esoft Group's ("Esoft") increasing use of data, cloud services, and artificial intelligence (AI) in Esoft's daily business operations.

This policy confirms Esoft's dedication to compliance with the legislative developments, including but not limited to, the EU General Data Protection Regulation 2016/679, the EU Data Act 2023/2854, and the EU AI Act 2024/1689.

The policy applies to all entities that are part of Esoft group of companies (CVR: 42534145). Any questions or concerns regarding the policy can be directed to legal@esoft.com.

2. Principles

The policy consists of two sets of principles:

- **Data ethics Principles:** Principles aimed at all types of data. These principles will support Esoft in making ethical decisions when collecting new data or processing existing data

- **AI Ethic Principles:** Principles specifically targeted at the risks associated with the use of artificial intelligence and machine learning. These principles will support decision makers in taking the relevant ethical questions into consideration.

2.1 Data Ethics Principles

1. Data Collection

Esoft strives to limit data collection, and data processing, to what is strictly necessary for the purposes of operating Esoft's business.

Esoft will ensure transparency, where possible, about what types of data is collected, for what purposes and, how the data is processed and protected.

Specifically, when processing personal data, Esoft will also provide information about which rights the individuals have, and how these rights can be exercised.

3. Data Security

Esoft has a employed a risk-based approach to data security, and has implemented organizational and technical security measures, to ensure all data is protected appropriately.

These security measures are reviewed and updated regularly to ensure they remain robust and fit for purpose.

In the event of a data breach, Esoft has implemented a data breach response plan, that is reviewed and tested regularly. The data breach response plan will ensure all necessary actions are taken, and the relevant stakeholders and/or authorities have been notified.

4. Data Sharing

Prior to sharing any data Esoft will ensure that the recipient, has been duly authorized to receive the data, regardless of whether the recipient is an employee or a third party.

All recipients of data shall have the necessary security measures in place to ensure the data's security will not be compromised by the data transfer.

Esoft will always strive to ensure that a minimum amount of access and/or data is shared and maintain full transparency about who data is shared with and why.

5. Data Retention and Deletion

Esoft will only retain data as long as it's necessary or for as long as it is legally required.

Where possible, Esoft will pseudonymize, anonymize or obscure data, to protect the identities of individuals. Esoft will observe legal requirements, and broadly adopted practices, to ensure the same level of privacy as other service providers of similar services.

6. Governance and Compliance

To ensure compliance is maintained, Esoft has assigned the responsibility for data ethics compliance to specific committees within Esoft. The committees conduct regular reviews to ensure compliance with legal requirements, as well as customer and supplier agreements.

In addition, the committees are responsible for maintaining an appropriate level of awareness among all employees who, as a part of their job, process data or are engaged in designing, purchasing or implementing technologies.

2.2 AI Ethics Principles

1. Responsibility

Esoft will only use AI systems in a manner that respects the rights of individuals.

Prior to adopting or utilizing existing AI technologies, Esoft will consider the benefits, as well as any negative impact it may have. To prevent bias, Esoft will maintain human oversight with its AI models, training data, and the data results produced by the AI.

In addition, the necessary privacy and security features and measures must be implemented "by-design", in all AI systems employed by Esoft.

2. Transparency

Through ongoing training and clear communication, Esoft maintains the trust of its audiences and clients while leveraging AI effectively in its productions.

Esoft will strive to communicate its use of AI-technologies in a transparent, and understandable manner.

3. Integrity & Security

Esoft is dedicated to ensuring that no unintended negative consequences result from Esoft's use of AI. Therefore, Esoft has established the necessary governance, and implemented a risk-based approach to AI adoption.

A dedicated oversight committee regularly reviews AI usage to stay aligned with developing regulations and best practices.

4. Data & Technologies

4.1   Use of Data

Data Types: Esoft processes various types of data including:

Data types	
Customer Personal Data	**Property Content**
Name	Pictures and Videos
Phone no	Floor plans
E-mail	Property Descriptions (text)
Physical addresses	3D virtualization

Transfer: Property content is an integral part of the products and services Esoft provides. To further competitiveness in Esoft's operating space, Esoft leverages Esoft production facilities in Vietnam.

To ensure data is safe and secure, regardless of where the data is transferred or resides, Esoft employs and maintains a robust compliance program. In addition, the entities operating outside of the EU/EEA, are ISO 27001:2022 certified.

4.2   Use of technologies

Cloud Services: Esoft leverages cloud services, to enable international collaboration internally, and to provide services to customers internationally.

Primary Cloud Service Providers			
Service Provider	**Data Location(s)**	**Service Description**	**Esoft Data**
Microsoft Ireland Operations Ltd	EU tenant	M365 Infrastructure as a Service Platform as a Service	Customer Contact Information
Amazon Web Services	EU root account APAC tenant	Infrastructure as a Service Platform as a Service	Property Content

AI Services: Esoft uses AI to reduce manual tasks and associated costs, this includes but is not limited to photo & video post-production, virtual staging, and generating floor plans, and text descriptions of properties.

Primary AI Service Providers		
Service Description	**Data Location(s)**	**Esoft Data**
Image enhancement system consisting of multiple inhouse developed AI services.	AWS (see above)	Image material from various sources/customers
LLM – Large language model Generating text outputs	US	Property metadata, Google location data
3D scan	EU	PointCloud/3D scan
3D visualization	Israel	Image material from various sources/customers

AI image editing	EU	Image material from various sources/customers

5. Approval

This Policy has been created in accordance with the § 99 of the Danish Financial Statements Act (Årsregnskabsloven) and was approved by the Board of Directors on the date signed below.

Name:

Date:

Signed: _____

Name:

Date:

Signed: _____