

Data Ethics Policy

1. Introduction

This policy describes cBrain's approach and principles regarding the company's data ethics, including how data is treated ethically correctly, responsibly and transparently. As cBrain attaches importance to acting as a proper and responsible social actor, it is natural for cBrain to establish a policy for this.

2. Background

As part of cBrain's internal operations, cBrain processes data on the company's affairs. As a supplier and in some cases an operating partner for the public sector at home and abroad, cBrain is in contact with vital social data. It places great and stricter demands on cBrain's and the employees' ability to handle data correctly. It is important that cBrain's customers and the outside world can have confidence in our handling of data. The policy is to contribute to this.

3. Data used

The data used by cBrain and our solutions can be of both a personally identifiable and non-personally identifiable nature.

Our internal operations include administrative data such as customer and employee data, including visitation data, as well as data in connection with the development and support of cBrain's solutions.

In relation to cBrain's customers, we get in touch with and process customers' data via cBrain's standard solutions for the market. These are typically data related to public sector litigation.

4. Provision of data

Data collection is primarily via cBrain's own standard system (F2) which is used in cBrain's internal operations as well as other common administrative solutions such as finance, payroll, owner accounting, etc.

cBrain's customers collect data as part of their case processing via cBrain's standard system F2.

In addition to providing case data, there is extensive logging of transactions to ensure a complete audit trail for actions and decisions. F2 is developed on the principle of privacy by design.

5. Use of data

cBrain uses the collected data regarding the company's own conditions for analysis, case processing and general business operations.

Log information is used for troubleshooting, optimizing and uncovering patterns that can be included in product development.

In relation to the customer's data which is processed via cBrain's standard systems, this is only done in accordance with concluded contracts and data processor agreements, including legislation.

In cBrain's standard system F2, data is used to support and optimize the caseworker's work by e.g. to propose actions, or via configured algorithms to make sub-decisions. These are documented in the customer's process library. In the case of access to documents, the relevant information may be disclosed to those who have lawful access to it.

The use of data is otherwise operationalized through internal policies and procedures, which are certified according to ISO 27001 and subject to control via annual external reviews carried out by the audit.

6. Data Ethics

cBrain's data ethics is based on the Data Compass, which was prepared by the government's appointed expert committee in November 2018.

cBrain manages personal information in accordance with the spirit and letter of General Data Protection Regulation (GDPR).

cBrain's product development is managed by a product board. Here, all significant decisions about the development and use of cBrain's standard products are made, including the use of new technology. The product board is responsible for including data ethics at an early stage of the development cycle. This applies not least in connection with decision support and automatic case processing, including the use of AI-based tools and algorithms. The company's CEO leads the meetings with the product board. The product board knows and takes basis on the Data Compass when designing and developing solutions.

When cBrain designs and configures specific solutions for customers, we as a supplier have an obligation to ensure that necessary discussions regarding data ethics are held with the customer and thus also raise any dilemmas that may arise.

cBrain is affiliated to the UNGC and is committed to supporting the UN's 10 principles in the field of human rights, anti-corruption, employee rights and the environment. cBrain has formulated a code of acceptable conduct which also applies to subcontractors. These principles and codes form an overarching guideline when it comes to data ethics.

7. Responsibility and follow-up

The responsibility for data ethics lies with the CEO (standard products) and the CFO (the company's own use of data). The Audit Committee monitors compliance with data ethics policy.

All employees are trained in the company's Code of Conduct and annually all employees are retrained and tested. Data ethics will in future be included in this training.

8. The data ethical compass



Source: Data Ethics Council Expert group's recommendations from November 2018

Log

Version	Date	Author	Description
1.0	2021.10.22	EJJ	Data ethics policy established
1.0	2021.11.03	EJJ	Approved by the Board of Directors
2.0	2023.04.19	EJJ	Revised. Approved by the Board of Directors
2.1	2025.08.20	EJJ	Revised. Approved by the Board of Directors