Statutory Statement on Data Ethics 2025-26

cf. the Financial Statements Act, section 99 d

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The statement is an integral part of the management commentary of the annual report of Gabriel Holding A/S for the 2025/26 financial year and includes the requirements of Section 99 d of the Danish Financial Statements Act (Statement on data ethics).

In 2022, the Gabriel Group adopted a policy for data ethics, which is based on the data ethical value compass from the Danish Council on Data Ethics in relation to the following values:

Self-determination	Equality & Justice	Dignity
Progressivity	Accountability	Diversity

The policy supplements Gabriel's other policies for IT security, as well as personal data and cookies, and also applies to selected partners' processing to the extent that Gabriel can influence these.

1. Data

Gabriel collects and uses data in relation to customers, suppliers, and other business partners, and in this context, Gabriel uses IT programs and algorithms to analyse data and compile statistics relevant to the Group's development and operation of the Group's activities, including marketing, case management and forecasting. Such data is collected by Gabriel as well as through third parties.

In addition to the above data, personal data for job applicants and employees is collected and processed as a regular part of Gabriel's recruitment and HR processes.

2. General principles

Any data collection is limited to the information absolutely necessary to provide Gabriel products and services, and data is stored as far as possible exclusively in Gabriel's internal but outsourced systems.

When using new IT suppliers, these are always assessed in relation to the policy for data ethics, it is important for Gabriel that when using new technologies, artificial intelligence or the like, it is ensured that the data processing takes place based on the principles of the policy including without system bias.

Gabriel prioritizes annually training selected employees in the handling of personal data. In relation to personal data, Gabriel enters into data processing agreements with third parties and does not sell data.

3. Anchoring

The senior management of Gabriel has the overall responsibility for ensuring that the policy for data ethics is respected.

The policy is approved annually by the Board of Directors and revised on an ongoing basis.