

# Data Ethics Policy

## 1. Introduction to BioPorto's Data Ethics Policy

This policy outlines BioPorto's approach to data ethics pursuant to section 99 d of the Danish Financial Statement Act.

The data ethics in this policy are the ethical principles we have committed ourselves to consider when using data and emerging technologies. These principles are to some extent moral principles in lieu of applicable legal requirements.

The purpose of this Data Ethics Policy is to guide ethical and responsible decisions on our use of data for maximal benefit and minimal harm for individuals and society.

## 2. Scope

This Data Ethics Policy applies to all data processing activities carried out by BioPorto A/S or any of its affiliates. The policy applies to all types of data including personal data and non-personal data.

## 3. Type and source of data

BioPorto provides clinicians with tools, currently the NGAL biomarker, to support risk assessment and diagnosis of acute kidney injury. We are committed to carrying out our business activities in compliance with applicable law including applicable data protection legislation.

We process various types of data such as:

- Pseudonymized data on clinical trial subjects related to kidney disease.
- Laboratory data related to development of medical devices.
- Personal data provided by employees, job applicants, customers or any other third-parties.
- Non-personal data on our operational assets or provided by customers or other third parties.

## 4. Data ethics principles

At BioPorto we are committed to the following ethical principles:

Responsible and accountable data processing:

- We take responsibility for identifying data processing activities in our business with the purpose of identifying and minimizing risks associated with the activity.
- We ensure that data is collected for clearly defined purposes and used in a lawful manner.
- Personal data will be processed only when necessary and for the purpose they were collected for.
- We focus on clear allocation of roles and responsibilities in contractual relationships that involve data being processed by different parties.
- We seek to minimize the data collected and processed.

Transparency:

- We uphold transparency concerning our use of data. We communicate our processing activities and the purpose thereof to individuals to ensure that they are aware of the processing activities carried out by BioPorto. Individuals should be able to understand how their personal data is used and the consequences hereof.

Data quality awareness and integrity:

- Data quality is essential to our business, especially for our clinical trials.
- We ensure that our processes, procedures and controls always comply with legislation and best industry practice to ensure accuracy, completeness, consistency, reliability, and validity of data.
- BioPorto prioritizes data integrity to ensure the safety and well-being of those affected by our processes.

#### Security:

- We have implemented appropriate security measures to protect data from being stolen, misused or otherwise compromised.
- Data in BioPorto's position is always processed and stored securely thereby minimizing the risk of data breaches.
- We use anonymization, pseudonymization, and data minimization including access restrictions as tools where relevant and appropriate.
- We have procedures in place to detect and respond to data breaches.
- Our employees receive training in IT security, data protection and data ethics.
- BioPorto has adopted and implemented policies of relevance to support this Data Ethics Policy in line with applicable legislation including a personal data protection policy, an IT security policy, a retention policy and a whistleblower policy.

#### Ethical data processing carried out by third parties:

- Contractors and other third parties' who process data on behalf of BioPorto must be committed to an appropriate level of data protection and be dedicated to ensuring and maintaining a high standard of data ethics.

### **5. Use of new technologies**

BioPorto's use of new technology such as machine learning, artificial intelligence and algorithms to process personal data is limited. We carefully analyze the impact on individuals and our business prior to the introduction of new technologies and monitor the use of new technologies for processing personal data, if introduced.

### **6. Governance and reporting**

This Data Ethics Policy is reviewed and approved annually by BioPorto's Board of Directors. This Data Ethics Policy forms the basis of the data ethics statement accompanying the management report, cf. section 99 d of the Danish Financial Statements Act.

The administration of this policy is anchored with BioPorto's QA IT Manager, the Leadership Team and the Legal Department to facilitate and ensure implementation of the policy in all part of the business.

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This Data Ethics Policy is approved by the Board of Directors of BioPorto A/S on 25 March 2026 and replaces prior version from 2022.