

DATA ETHICS PLAN

1. INTRODUCTION

This plan is designed to articulate how New Moment manages data in an ethical, responsible, and transparent manner. In today's age, data plays a crucial role in business operations and New Moment is committed to ensuring full legal compliance when it comes to collection, storage, and utilization of data.

However, our commitment goes beyond legal obligations. New Moment strives to handle data not only within the parameters of the law but also through an ethical framework. In this Data Ethics Plan, we outline the principles that guide how New Moment manages data.

2. PRINCIPLES

New Moment has defined a few data ethic principles to ensure that appropriate measures are in place to safeguard ethical data processing within New Moment.

- a. **Transparency** - Transparency involves a commitment to clear communication with users. This encompasses disclosing the specifics of data collection and informing individuals about the nature of data held by the organization, as well as the explicit purposes for which this data is utilized.
- b. **Accountability** – New Moment takes full responsibility for the data we handle. Clear governance, effective policies and procedures, and continuous training and monitoring are part of our culture.
- c. **Responsible data sharing** - We believe in sharing data only when necessary, following a need-to-know approach. Our processes for sharing data are built to consider and protect individuals' rights actively and consistently.
- d. **Fairness and non-discrimination** – Any bias must be avoided, as it can have severe negative implications. Data collection and processing must therefore be unbiased, impartial, and shall correspond to individual needs.

3. GDPR: General Data Protection Regulation

New Moment Slovenia office is fully complied with the General Data Protection Regulation. However, other offices are also complying with the GDPR as it is the cornerstone of the modern data protection regulation which provides high protection for data subjects.

4. INFORMED CONSENT TO DATA PROCESSING

Informed consent is the cornerstone of research ethics. We always explain to research participants what our research is about, what their participation in a project will entail and any risks that may be involved. Whenever we collect personal data directly from research participants, we are seeking their informed consent by means of a procedure that meets the minimum standards of the GDPR. This

requires consent to be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the subject's agreement to the processing of their personal data.

We keep records documenting the informed consent procedure, including the information sheets and consent forms provided to research participants, and the acquisition of their consent to data processing.

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5. USE OF PREVIOUSLY COLLECTED DATA ('SECONDARY USE')

If we are processing personal data in our research without the express consent of the data subjects, we will explain how we obtained the data, justify their use in our project and ensure that the processing is fair to the data subject. If we are using data that are publicly available, we will provide details of the source(s) and confirm that the data are openly and publicly accessible and may be used for research purposes. If we intend to use personal data that were collected from a previous research project, we will provide details regarding the initial data collection, methodology and informed consent procedure.

6. DATA SECURITY

Security is the very important part of our business. New Moment always strives to provide a high level of both physical and IT based security measures as well as always giving all our employees the proper training so as to ensure compliance with all applicable law. All employees are subject to a contractual duty of confidentiality and have signed a declaration of confidentiality.

7. EU PROCESSING AND TRANSFER

New Moment Slovenia is always considering first to process data only in the EU. If project requires us to do so all processing takes place in EU, and we engage EU based tools.

If there is need to process personal data out of EU, New Moment shall ensure that the recipients of the data will ensure the same level of data protection as is required under EU law. Additionally, for data transfers to non-EU countries to be lawful they must be predicated on one of the grounds provided by the GDPR.

8. UNAUTHORIZED ACCESS AND MISUSE OF DATA

New Moment is committed to the responsible handling of personal data, our consistent efforts are dedicated to shielding data subjects from unauthorized access and misuse, including potential leaks, to prevent any form of data exploitation by third parties. This commitment reflects New Moment's dedication to maintaining the highest standards of data security and privacy.

We aim to create an environment where users can trust that their personal information is handled with the utmost care and ethical consideration.

9. DELETION OF DATA

At New Moment, we are consistently working to make sure personal data and any outdated information are promptly and securely deleted. This ongoing effort is part of our proactive approach to ensure that we retain only the essential information about data subjects, avoiding unnecessary data storage.

Our commitment to regular data deletion aligns seamlessly with our dedication to the principle of data minimization. By routinely removing outdated or irrelevant data, we not only adhere to ethical standards but also take a proactive stance in preventing the accumulation of excess information about data subjects.

10.EMPLOYEES

At New Moment, we believe in keeping our team well-informed about data ethics, security, and the proper handling of personal data. We're ensuring that our team has the knowledge and skills needed to maintain highest standards in data ethics and security.

11.AI SYSTEMS

All AI systems New Moment uses must comply with the law and this Data Ethic Plan. New Moment undertakes to collaborate with AI system providers who have high ethical standards and prioritize privacy protection throughout the entire process, from design and development to implementation.

AI systems will not be used to delegate entirely the responsibility in the results of algorithms, but will be overseen by humans, mitigating the risk of misuse. All AI systems must maintain human involvement and use data in a way that treats people fairly, reliably and enables socially responsible decisions.

12.DATA PROTECTION OFFICER

New Moment has a dedicated GDPR specialist tasked with helping New Moment's Data Protection Officer (DPO) to oversee and analyse New Moment's processing activities focusing on GDPR compliance. Similarly, New Moment has an information security team which is tasked with helping New Moment to ensure a high level of data security. The fact that these efforts fall under the responsibility of the DPO and the head of security helps to ensure that the entire data area is handled properly and continues to be given priority.