

Ethical Artificial Intelligence Policy

1. Our Commitment

At Facephi, we use Artificial Intelligence (AI) as a key element to drive secure, innovative and reliable solutions in the field of digital identity.

Our commitment is to ensure that the use of AI is carried out in an ethical, responsible and secure manner, in compliance with applicable regulations, always placing people and the protection of their rights at the center of our technological decisions.

2. Scope of Application

This Ethical Artificial Intelligence Policy applies to the AI systems that Facephi:

- develops or integrates into its solutions,
- uses in its internal processes,
- incorporates through suppliers and technology partners,

whenever such systems may have an impact on customers, users, employees or third parties.

3. Ethical Principles Governing Our Use of AI (*White Paper on AI – European Parliament*)

- Legality and Compliance
Facephi uses AI systems in accordance with applicable legislation, particularly in matters relating to personal data protection, information security, intellectual property, and relevant technological and sector-specific regulations.
- Privacy Protection
Privacy protection is an essential principle in the use of AI. Facephi applies data minimization criteria, privacy by design, and appropriate technical and organizational measures to protect information.
- Human Oversight
AI is a support tool, not a substitute for human judgment. In relevant uses, especially those with significant impact, we ensure appropriate mechanisms for human oversight.
- Responsible and Proportional Use
AI is used solely for legitimate, defined and proportionate purposes. We avoid uses that may generate discrimination, manipulation, lack of transparency, or undue negative impacts on individuals.
- Transparency

Where the use of AI is relevant for customers or users, Facephi promotes a transparent approach, providing appropriate information on its use without compromising security or the rights of third parties.

- Fairness and Bias Mitigation

Facephi works to prevent and mitigate potential biases in AI systems, with the aim of promoting fair and equitable outcomes consistent with the company's values.

- Security and Robustness

AI systems are managed under criteria of security, reliability and resilience, in accordance with applicable best practices and international standards.

- Accountability

Facephi assumes responsibility for the use of AI systems integrated into its operations, establishing governance and control frameworks aligned with the nature and risk of each use.

4. Relationship with Third Parties

Facephi expects its suppliers and technology partners to adopt principles consistent with this Policy, especially with regard to ethics, security, data protection and the responsible use of Artificial Intelligence.

5. Continuous Improvement

This Policy is reviewed periodically to adapt to technological and regulatory developments, as well as to international best practices in the field of Artificial Intelligence.

6. Reference Framework

This Policy is inspired by and aligned with recognized frameworks and standards, including:

- European Artificial Intelligence Regulation (AI Act).
- General Data Protection Regulation (GDPR).
- ISO/IEC 42001 – Artificial Intelligence Management Systems.
- NIST AI Risk Management Framework.
- European Guidelines on Trustworthy AI.

Final Statement

We are aware that trust is an essential element in any digital identity system. Therefore, the use of Artificial Intelligence in our products and processes is always conceived as a means to strengthen security, reliability and the protection of individuals.

We are committed to using Artificial Intelligence responsibly, under criteria of legality, human oversight and respect for privacy, ensuring that its application contributes to improving our services without generating undue negative impacts. AI does not replace human judgment, but supports it, and its use must be consistent with the values and responsibilities we assume as a technology provider.

This commitment forms part of a continuous improvement approach, in which technological innovation is developed in a manner compatible with the trust of our customers, partners and users, and with compliance with the legal and ethical obligations applicable to us.