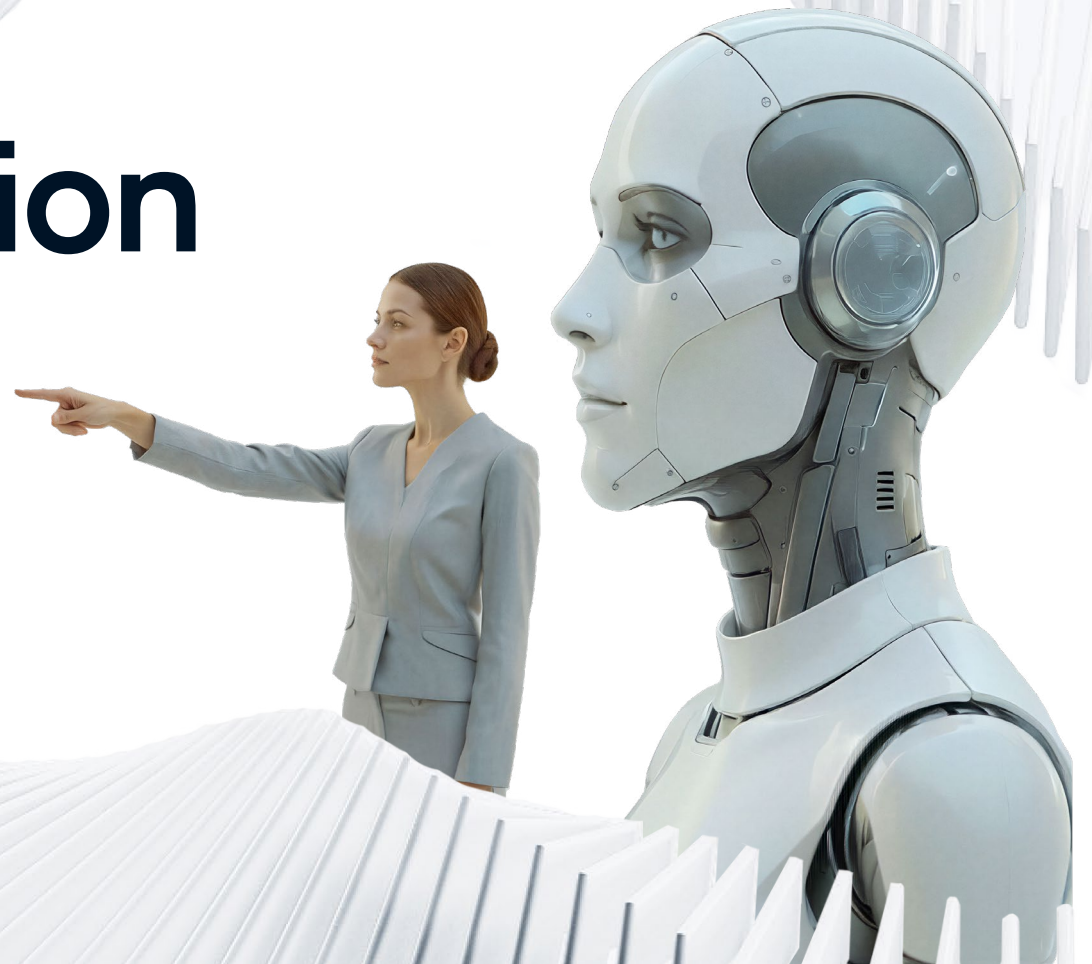


Data Protection Report 2025

Let's Go Beyond_



Click the link below to view our 2026 Annual Report.

gft.com



Dear Readers,

Artificial Intelligence has become a decisive factor in how organizations innovate, compete and create value. This is not only a question of technological capability, but also a question of trust. As AI becomes an increasingly integral element of how organizations operate, trust becomes an essential enabler for the AI-driven transformation of the organization.

At GFT, we firmly believe that trust is earned when innovation is accompanied by responsibility and that the future belongs to organizations that effectively combine technological excellence with responsibility. Innovation and responsibility are not competing objectives; rather, they are complementary forces that reinforce each other. The ability to industrialize AI successfully on a sustainable basis will ultimately depend on maintaining the trust of all stakeholders. This is particularly relevant in the highly regulated industries and mission-critical environments in which many of our clients operate.

Throughout the reporting year, we continued to strengthen our Data Protection Framework and deepen the integration of best practices in Responsible AI

into our business practices. We further advanced our policies, guidelines, awareness initiatives and assessment processes to address the opportunities and challenges associated with the adoption of new technologies in general and AI in particular.

The most important element in fostering trust cannot be captured by a policy or guideline. It lies in the personal commitment of our employees to ask difficult questions, challenge assumptions and take ownership to protect the trust that clients, colleagues and partners place in us every day.

At GFT, teams everywhere are actively taking ownership and embedding fairness, transparency and accountability into our projects from the outset. This demonstrates another important element of our approach: the understanding that trust cannot be added at the end of a process—it must be designed, built and maintained throughout the entire lifecycle.

In the long run, I believe the most successful organizations will not simply be those that deploy the most advanced AI. Rather, they will be organizations that combine technological excellence with the ability to earn the trust of the people they serve. It is this belief which is bolstering our ambition to become the world's best responsible AI-centric digital transformation company.

And it is thanks to this ambition that we have been able to fulfil our commitments under the AI Pact and document them in a final report successfully submitted to the European Commission at the end of the reporting year. You will find more details in the Data Protection Report in front of you.



As there is not enough space here to describe all our achievements, I will mention only that as in the previous year, GFT received the prestigious PICCASO Award once more in 2025.

Irrespective of achievements in 2025, we remain conscious that technological progress, geopolitical developments and evolving regulatory expectations will continue to create new challenges. Therefore, we remain committed to continuously improving our practices and strengthening our capabilities so that we can stay ahead of emerging risks while supporting responsible innovation. Having said this, I am pleased to present the Data Protection Report 2025 of the GFT Group. The report demonstrates how data protection continues to evolve at GFT as a strategic enabler of trusted digital transformation.

Ernst O. Wilhelm,
Chief Privacy Officer & Group DPO,
GFT Technologies SE

“Trust cannot be added at the end of a process – it must be designed, built and maintained throughout the entire lifecycle.”

ERNST O. WILHELM,
CHIEF PRIVACY OFFICER & GROUP DPO

Data Protection & Privacy at GFT

GFT Group Data Protection Framework

The GFT Group Data Protection Framework is based on respect for human rights – especially regarding the development and application of information technology. The aim is to strengthen confidence in digital transformation. The GFT Group Data Protection Framework ensures the integration of data protection into all business units and all national subsidiaries of the GFT Group.

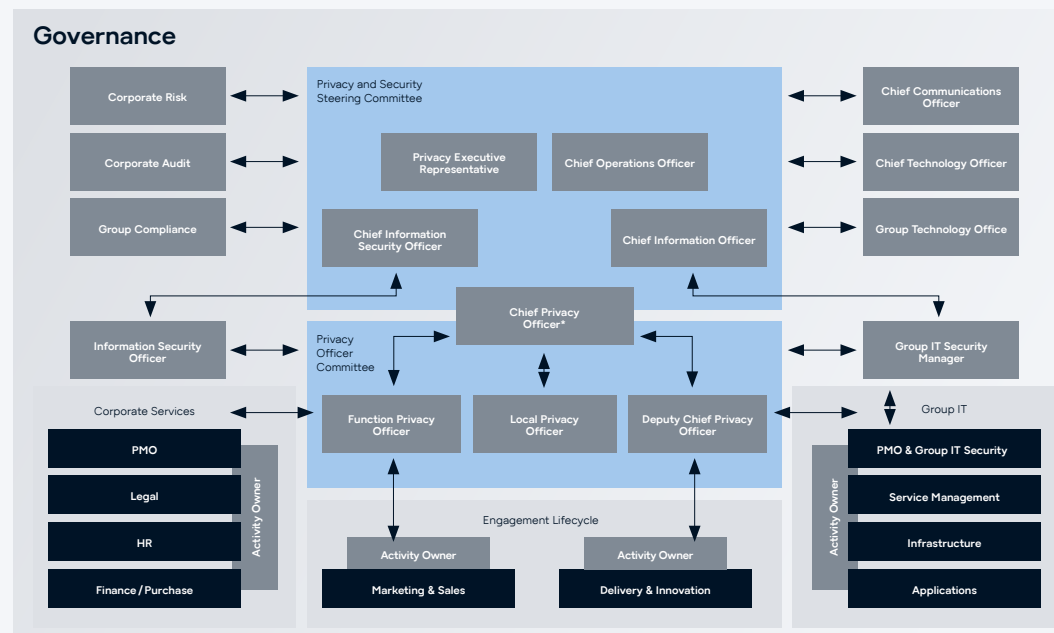
In doing so, it is guided by ethical standards as well as relevant laws such as the EU General Data Protection Regulation (GDPR) and the EU AI Regulation (AI Act). The GFT Group Data Protection Framework is based on the following pillars:

- GFT Group Data Protection Team
- GFT Group Data Protection Policy & Guidelines
- GFT Group Data Protection Training & Awareness
- GFT Group Data Sharing Framework
- GFT Group Data Protection Incident Handling
- GFT Group Data Protection by Design
- GFT Group Data Protection Responsible AI

GFT Group Data Protection Team

Under the leadership of the Chief Privacy Officer (CPO), the global GFT Group Data Protection team supports the integration of data protection into everyday business at Group and country level as well as into GFT's internal and external customer activities. The team also promotes consistent data protection practices within the Group and at the interfaces with customers, partners and suppliers.

The CPO, the CPO's deputies and the Function Privacy Officers are responsible for data protection requirements at Group level. In order to ensure consistent data protection within the GFT Group, there is a responsible Local Privacy Officer for each country where GFT operates, even if this is not mandatory by local law. Local Privacy Officers and their deputies act on behalf of the CPO, who represents the Single Data Protection Officer of the GFT Group. Local Privacy Officers ensure the implementation of the Group Data Protection Guidelines and the data protection requirements at local level. The CPO reports to the Privacy Executive Representative, a role held by the Group CFO and chair of the Privacy and Security Steering Committee (PriSecCo). The PriSecCo provides executive-level supervision, business alignment and sustained management commitment across all business functions and processes.



* representing the „Single Data Protection Officer“ for the GFT Group according to Art. 37 (2) GDPR

Click to enlarge

Governance

The GFT Group Data Protection Team's training is based on the training programme of the International Association of Privacy Professionals (IAPP) and supplemented by coaching by the CPO and visits to conferences and professional exchange groups. The IAPP is the world's largest organization for privacy professionals with globally recognized standards for data protection education and certification.

All Local Privacy Officers and Function Privacy Officers are members of the Privacy Officer Committee, chaired by the CPO. It is the heart of the GFT Group Data Protection Network and serves as a bridge between Group Data Protection and Local Data Protection. All Privacy Officers come together on a monthly basis to discuss updates to the data protection guidelines, new or changed processing activities, their assessment from a data protection perspective, selected decisions of relevant courts (e.g. the European Court of Justice) as well as innovations regarding the GDPR or country-specific decisions of the respective supervisory authorities. Privacy engineers are responsible for privacy-related topics in the projects/applications assigned to them. They may also be asked by the Function and Local Privacy Officers for an opinion if their technical expertise is required.

In 2023, our CPO in Brussels was awarded the IAPP Global Vanguard Award EMEA – an honor for exceptional leadership, expertise and innovation in the field of privacy and data protection. In 2024, our CPO in London was honored with the PICCASO Award in the category “Best ESG Privacy Initiative” highlighting GFT's strong commitment to data protection within the framework of the environmental, social and governance (ESG) principles.

You can find out more about the Group Data Protection Policy on the GFT website.

[gft.com](https://www.gft.com)



GFT's CPO was once again honored with the 2025 PICCASO Award, this time as “Outstanding DPO (Large Company)” – recognizing excellence and passion in data protection.

PICCASO stands for “Privacy, InfoSec, Compliance, Culture, AI, Strategy & Operations”. The corresponding award recognizes individuals who are making outstanding contributions to this dynamic and fast-growing sector: from the professionals who ensure that their companies meet increasingly complex legal requirements, to the academics and engineers who are thought leaders in data protection and driving innovative protections.

In 2025, our CPO was honoured once more with the PICCASO Award, this time in the category “Outstanding DPO (Large Company)”, illustrating that data protection at GFT is driven by excellence and passion.

GFT Group Data Protection Policy & Guidelines

The rules for data protection in the GFT Group are based on its corporate values and the GFT Group Data Protection Statement “We consider data protection to be an integral part of our everyday business operations”. The aim of the GFT Group Data Protection Policy & Guidelines is to establish and permanently ensure an appropriate and uniform level of data protection within the GFT Group and at the interfaces with customers, suppliers and partners. The scope of the GFT Group Data Protection Policy extends to all business activities in all business functions and processes, to all legal entities directly or indirectly associated with GFT Technologies SE and to all countries in which the GFT Group operates. The GFT Group Data Protection Policy and other data protection guidelines are of particular relevance for countries without data protection laws and/or with an inadequate level of data protection. In 2023, an excerpt of the internal data protection policy was published on the company's homepage for the first time. In 2024, the guideline received a new section on “Responsible AI”, which has also been published.

We aim to ensure efficient and standardized processing in accordance with legal requirements and in recognition of the rights and freedoms of data subjects – in support of our global business model. GFT conducts internal checks to ensure compliance with data protection guidelines and has integrated data protection and privacy as a regulatory risk into Group-wide risk and compliance management. Further information can be found in the Risk and Opportunity Report in the Integrated Annual Report 2025.

GFT complies with the applicable labor and social standards (see also Group Sustainability Statement in the Integrated Annual Report 2025). We respect the right to privacy of our employees. This is regulated in our GFT Group Data Protection Guideline for Handling of Employee Data, which represents a refinement of the overarching GFT Group Data Protection Policy in the handling of employee data. The guideline provides assistance for GFT employees involved in the processing of employee data and creates transparency for all GFT employees about the handling of their data.

GFT Group Data Protection Training & Awareness

The application of the GFT Group Data Protection Policy & Guidelines in day-to-day business operations is supported by training and awareness measures. The training concept consists of a series of standardized data protection training courses for all employees (Data Protection Foundation Training), supplemented by target group-specific training courses. These are tailored to specific topics and/or positions, for example privacy engineers or HR managers. The standardized data protection training courses aim to ensure a basic and uniform understanding of data protection issues in all GFT business units across all national borders. The tailor-made training courses serve to deepen the understanding of data protection in relevant areas and to refresh it if necessary. The Data Protection Foundation training is mandatory

for all employees and contractors throughout the Group. It must be completed within 30 days of joining the company – even in countries without corresponding legal requirements. All privacy training includes a quiz that requires a certain percentage of correct answers to pass. In 2025, Sophos employees have been fully subjected to the GFT Global Mandatory Training Directives. The rate of successful participation in the GFT Group's standardized data protection training courses with full consideration of employees of Sophos Solutions S.A.S. which was acquired by GFT in 2024 was maintained at 99% in 2025.

The data protection training programme is complemented by special awareness-raising measures. In 2025, the focus was on the responsible use of AI (see section "GFT Group Data Protection Responsible AI Approach").

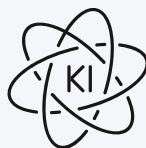
Further training and awareness-raising measures are supplemented as required, for example if customer needs, regulatory developments, organizational changes or the training needs of individual target groups require it.

In 2025, AI Literacy Training was added to the GFT Global Mandatory Training Directives and reached a 98% participation rate by the end of the reporting period (see section "GFT Group Data Protection Responsible AI" for more information).

GFT Group Data Sharing Framework

The digitization of business processes is accelerating, as is the use of cloud-based tools, artificial intelligence and other modern technologies. Uniform standards are needed to regulate the increasing sharing and transfer of personal data between different GFT entities across national and legal borders. At the same time, legal compliance and security must always be guaranteed for many processes, even in a very dynamic business environment. In response, GFT has introduced a unified and easily adaptable approach to the exchange of personal data within the Group: The GFT Group Data Sharing Agreement creates a modular legal framework for the secure and lawful transfer of personal data within the GFT Group. As a result, all GFT legal entities are bound by uniform data protection standards – even in countries without data protection laws or a level of protection comparable to the GDPR.

Moreover, the GFT Group Data Sharing Framework is a flexible and powerful tool for organizational transformation. Among other elements, the Data Sharing Framework contains a data sharing model in which GFT Technologies SE in its holding capacity defines the means and purposes for global processing activities for common needs across all entities and business functions of the GFT Group including but not limited to Human Resources and Customer Relationship Management, IT and Cybersecurity operations as well as Compliance Monitoring and Whistleblowing. These global processing activities are augmented by regional



1,600+

employees trained in
Privacy Engineering

More on the topic
Recommendation on the
Ethics of Artificial
Intelligence in the internet.

acm.org



or local processing activities for specific needs which are not relevant for entities of the GFT Group. This approach helps GFT to transform into a Highly Efficient Global and Local Operating Organisation with increased scalability, speed, excellence, and strengthened long-term competitiveness and differentiation.

GFT Group Data Protection Incident Handling

A data breach and/or violation of the rights of data subjects, if not adequately and timely remedied, may result in physical, material or immaterial harm to natural persons, such as loss of control over their data or restriction of their rights, discrimination, identity theft or fraud, financial loss, reputational damage or other significant economic or social damage. To prevent this, GFT has established a global process for handling information security and data protection incidents. All GFT employees are required to report any event that could lead to a data breach immediately.

A qualified team reacts quickly to each report and checks to what extent information security and data protection standards have been compromised. The implementation of an action plan is intended to avoid high risks to the rights of potential data subjects. In 2025, no critical or substantiated data protection incidents occurred at GFT.

Furthermore, no data breaches of customer data occurred during the reporting period with regard to the GFT products mentioned below:

- Wynxx (an integrated product based on generative AI to optimize the software development life cycle)
- Smaragd (software solution for banking customers to comply with regulatory requirements)
- SPHINX OPEN (platform for advanced data analysis and processing for IoT and AI applications)
- Engenion (Project portfolio management software for complex development projects)

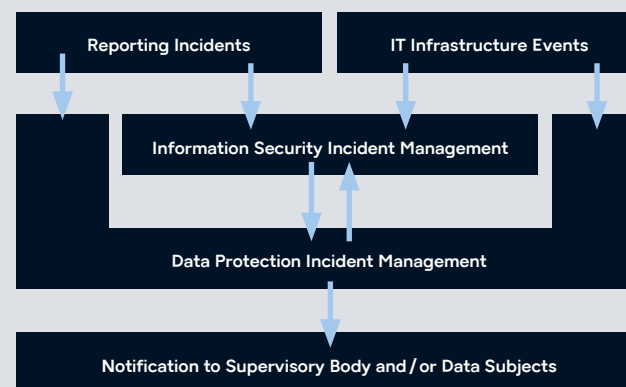
With regard to Smaragd in particular, GFT confirms that the agreed technical and organizational measures (TOMs) remained implemented throughout the period and that no material changes to the data protection controls had adversely affected the protection level of customer data. Furthermore, the treatment of anonymized training data sets voluntarily provided by selected clients for AI training purposes was reviewed and streamlined as part of an internal optimization activity to enforce the application of

data protection controls not only in the application but also in AI training related processes.

Enterprise GPT (platform for the fast and secure integration of generative AI into business processes) was decommissioned as GFT product in 2025.

GFT Group Data Protection by Design

This approach aims to integrate all data protection requirements into the system architecture and software development from the very beginning. Privacy by Design is relevant for GFT both from the perspective of internal data processing and in the context of customer-oriented solutions. As a developer of products, services and applications, GFT takes the principle of Privacy by Design into account in its development and design, considering the current state of science and technology. GFT ensures that the stakeholders of such products, services and applications have the opportunity to express their expectations regarding



Privacy by Design, and that these expectations are incorporated into the development and design process. Accordingly, the privacy-by-design approach is anchored in the GFT project methodology and begins with the question of data protection requirements in the project initialization document.

In the GFT Group, the CPO established the privacy-by-design approach back in 2020 through a workshop with privacy-by-design expert Jaap-Henk Hoepman. The approach is documented in the GFT Group Data Protection Policy and in the GFT Group Data Protection Guidelines on Privacy by Design. The first volume (Basic) of the Privacy by Design Guidelines was published in 2022, followed by the second volume (Intermediate) in 2023.

The focus of the Privacy-by-Design Campaign 2024 was the proactive consideration of data protection risks in the use of future technologies and in complex IT projects, as well as the principles of data economy and pseudonymization. More than 1,600 employees took part. On the initiative of the CPO, Privacy Engineering was included as a discipline in the GFT internal Distinguished Engineer Program in 2024.

In 2024, targeted privacy-by-design assessments were carried out for the Smaragd and Wynxx software solutions of GFT. Proactive measures were coordinated with management to constructively minimize possible data protection risks.

In 2025, an AI-centric DPIA was carried out for the IAC module of the Smaragd software solution. Proactive measures were identified and agreed with management to constructively minimize possible data protection risks.

At GFT, specially trained privacy engineers implement the GFT approach to privacy by design in relevant projects. This initiative was launched to recognize outstanding talent and achievements within the GFT tech community.

While continuing his responsibilities as Deputy Chief Privacy Officer, Marco Cantin became GFT's first Distinguished Privacy Engineer in 2025. His nomination developed from sustained work in Privacy by Design, privacy engineering, assessments and the integration of privacy into GFT methodology. This recognition demonstrates how privacy engineering has become an integral part of GFT's approach to responsible technology and innovation.

GFT Group Data Protection Responsible AI

With the further development of AI, the challenges around data protection are also increasing. That's why it's crucial for GFT that innovation and responsibility go hand in hand: We integrate data protection into our AI solutions from the very beginning – from conception to implementation. As part of our Responsible AI approach, the following points are addressed in particular:

- Compliance with legal requirements, such as the EU AI Act, systematically minimizes risks
- Fair and explainable AI strengthens the trust of customers and partners
- Sensitive information is protected with a privacy-first approach

As early as 2020, GFT issued a guideline on the responsible use of AI and machine learning, based on the Statement on Algorithmic Transparency and Accountability of the Association for Computing Machinery (the ACM is the world's largest organization for IT professionals). In 2021, a supplementary guide to pseudonymization followed. Triggered by the ban on ChatGPT by the Italian Data Protection Authority in March 2023, GFT's CPO initiated an ad hoc Responsible AI Governance Taskforce, which developed a group-wide guide for the responsible use of ChatGPT and similar tools.

With regard to the AI Act, which came into force in August 2024, GFT has implemented the following measures as part of the Responsible AI approach:

- In April 2024, a new guideline was added to the GFT Group Data Protection Framework in the form of the GFT Group Data Protection Guideline for Responsible AI. This guideline refers to the values and principles of UNESCO's Recommendation on the Ethics of Artificial Intelligence as well as AI Act regulations on unacceptable and high-risk AI systems.
- In September 2024, GFT signed the Declaration of Core Pledges as part of the AI Pact, a clear commitment to the responsible development and use of AI to drive business transformation. The AI Pact is an initiative of the EU Commission that encourages companies and organizations to prepare for the requirements of the AI Act at an early stage, in order to promote trust in artificial intelligence. We want to help our customers fully exploit the possibilities of AI – legally, securely and ethically.

More information on „UNESCO AI Guidelines“:

[digital-strategy.ec](https://digital-strategy.ec.europa.eu/en/policies/artificial-intelligence) →


[digital-strategy.ec →](https://digital-strategy.ec.europa.eu/en/policies/artificial-intelligence)

[AI Pact Info →](#)

- In November 2024, the GFT Group Executive Board adopted a new version of the GFT Group Data Protection Policy. It contains a new section on “Responsible AI” and has been rolled out worldwide in the GFT Group together with the newly created GFT Group Data Protection Guideline for Responsible AI.

In September 2025, GFT delivered the final AI Pact Report to EU Commission report which demonstrated how GFT's ambition to become a responsible AI-centric company is being translated into concrete governance, risk management and workforce capabilities. Among other achievements, the report highlighted the following achievements:

- Responsible AI embedded into GFT's governance model: GFT started to build Responsible AI into its existing Group Data Protection Framework, including the GFT Group Data Protection Guideline for Responsible AI and a Responsible AI section in the Group Data Protection Policy. Rather than creating parallel compliance structures, GFT uses an

integrated AI-DPIA, combining relevant AI Act fundamental rights considerations with established GDPR risk assessment processes. In August 2025, GFT's governance approach was complemented by the Center of Excellence AI, designed to enable safe tooling, scale impactful use cases and empower people through knowledge.

- Innovation accompanied by systematic AI risk management: GFT introduced a Threshold Assessment covering high-risk AI systems as well as prohibited AI practices. Relevant systems and use cases can subsequently undergo an AI-DPIA. For generative AI, a continuously maintained internal reference list distinguishes approved, tolerated, not recommended and prohibited tools and provides tool-specific guidance. A key principle is that GFT or client data should not be processed by an AI tool unless it has been appropriately reviewed and cleared.
- Responsible AI competence at global scale: GFT completed dedicated AI Literacy Training for its entire workforce, reaching more than 12,000 technology experts across more than 20 countries.

The training combines practical understanding of AI with ethical, GDPR and AI Act considerations and responsible usage. Its modular design, optional deep dives and innovative use of an AI-generated virtual tutor turn regulatory literacy into practical experience. By the end of 2025, the AI Literacy training was successfully completed by 98% of employees.

“AI systems need large amounts of data to be powerful – at the same time, they must be designed to be fair, explainable and secure. That is why we at GFT Technologies believe that innovation and responsibility are inseparable.”

ERNST O. WILHELM,
CHIEF PRIVACY OFFICER & GROUP DPO

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