

## Data-ethics report 2022

7 December 2022

*Reporting on the policy for data ethics, cf. Section 26 of the Danish executive order on financial reporting for the Danish Labour Market Supplementary Pension Fund, the Danish executive order no. 771 of 31 May 2022. This report is part of the management's review in ATP's annual report for 2022.*

The use of data is increasing rapidly in a digital society such as Denmark, and therefore it is important to have guidelines and a good data ethics culture in place. ATP is entrusted with important tasks, including ATP Livslang Pension (Lifelong Pension), but it is also entrusted with the administration of a large proportion of public welfare benefits in Denmark. ATP uses data to solve these core tasks - for the benefit of both individuals and society as a whole

### Policy for data ethics

On 5 April 2022, ATP's Supervisory Board approved ATP's policy for data ethics. The policy is intended to specify the data ethics frameworks for ATP's use of data and thus serve as the basis for weighing societal interests in the data processing against the respect for the rights and expectations of individuals.

ATP's data ethics frameworks are to ensure that:

- Danish society trusts ATP to process data
- ATP is transparent in its administrative work
- ATP processes data securely
- ATP uses technology and data responsibly

The policy applies to the entire ATP Group, including subsidiaries, and for all schemes that ATP provides statutory administrative assistance for (including ATP).

### ATP's guidelines for data ethics

On 1 July 2022, ATP's guidelines for data ethics entered into force. The guidelines are specified in ATP's policy for data ethics and are intended to describe the processes that are to be followed when there are data ethics considerations in connection with the use of or expected use of data. Data ethics issues can also arise in both manual and semi-automated processes and when using advanced data analysis including when revisiting existing usage of data. The latter is managed on an ongoing basis via a risk-based approach.

The guidelines are relevant to the use of all types of data. The guidelines support the facilitation of a process that is to result in an assessment of whether any given data processing and use of advanced data analysis is to be assessed as being right or wrong from an ethical perspective and whether such activities are in accordance with ATP's data ethics frameworks.

### Ongoing evaluation

Data ethics is a dynamic area where societal norms develop over time, and therefore ATP is monitoring the developments in the area of data ethics frameworks and legal requirements. ATP's ambition is to make a positive difference and we recognise that this ambition requires an ongoing adjustment and development of ATP's policy for data ethics as the world's expectations for data ethics change.

The policy for data ethics must be presented to ATP's Supervisory Board at least once a year for the purpose of assessing whether it is still acceptable, and a report on compliance is to be included. If there are significant changes to the conditions that the policy is based on or significant changes to the societal norms, it will be assessed whether the policy and the associated guidelines need to be adjusted.