

## Data ethics report 2025

10 January 2026

*Reporting on the policy for data ethics, cf. Section 26 of the Danish executive order no. 1600 of 14 December 2023 on financial reporting for the Danish Labour Market Supplementary Pension Fund. This report is part of the management's review in ATP's annual report for 2025.*

Use of data is increasing, especially in a digital society, and this is why guidelines and a good data ethics culture are important. ATP uses data to fulfil the tasks assigned to ATP by the Danish Parliament – for the benefit of both individuals and society. ATP manages ATP Livslang Pension (Lifelong Pension) for more than 5 million members, and is also entrusted with important tasks as the administrator of a significant part of the public welfare benefits in Denmark, including through Udbetaling Danmark and Labour Market Insurance.

### Policy for data ethics

In 2022, ATP's Supervisory Board approved the Data Ethics Policy for the first time. In 2024 and 2025, the policy was adjusted to update the language in relation to the technological development in artificial intelligence and the inclusion of consideration of principles of sustainability in the use of technology.

The policy applies to the entire ATP Group and to all programmes to which ATP provides statutory administrative assistance.

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 goals must support 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

### Ongoing evaluation

Data ethics is a dynamic field where societal norms evolve over time. The rapid development in artificial intelligence over the past few years has also led to an increased focus in ATP on the interaction between artificial intelligence and data ethics.

ATP's ambition is to make a positive difference, and we recognise that this ambition requires 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 in the assumptions underlying the policy or significant changes to societal norms, the policy shall be adjusted.