

PROCESSING OF PERSONAL DATA

THE ATP GROUP

Data protection is a high priority for the ATP Group, and we are focused on only collecting and processing the personal data that is necessary in order for us to complete our tasks. ATP is required by law to provide an effective administration and to ensure payments to a number of labour market, insurance and welfare schemes. We have written this document in order to explain in general terms how the ATP Group processes personal data and to inform you where you can find further information about how personal data is processed in the various Group schemes.

1 DATA CONTROLLER

The legal entity that is responsible for the processing of your personal data is:

The Danish Labour Market Supplementary Pension Scheme (ATP)

CVR no. 43405810

Kongens Vænge 8

3400 Hillerød

Denmark

You can get in touch with ATP in the following ways:

Email: Via Digital Post through Borger.dk's self-service solution for the relevant scheme or via [the contact form on our homepage](#)

Telephone: 45 70111213.

Regular post: The Danish Labour Market Supplementary Pension Fund (ATP)

Kongens Vænge 8

3400 Hillerød

Our Data Protection Officer (DPO) can be contacted via:

Email: dpo@atp.dk

Telephone: 45 70111213.

Regular post: The Danish Labour Market Supplementary Pension Fund (ATP)

For the attention of: The Data Protection Officer (DPO)

Kongens Vænge 8

3400 Hillerød

2 THE PURPOSE OF THE PROCESSING AND FURTHER INFORMATION

2.1 Processing of citizen data

ATP's primary responsibility is to help ensure basic financial security and contribute to efficient welfare. To that end, we seek to generate high and stable investment returns for the benefit of pensioners

receiving ATP Livslang Pension (Lifelong Pension) and to ensure a high-quality and efficient management and disbursement of insurance and welfare benefits.

ATP handles all aspects related to ATP Livslang Pension which ATP is the Data Controller of. ATP, in its capacity as a data processor, also processes personal data on behalf of third parties as the Processing Business is in charge of the administration and disbursement of a long list of insurance and welfare services ("schemes"). On Borger.dk, you can read more under each relevant scheme about what information this concerns and how it is processed. Among other things, you can find more information on:

- Who is the Data Controller of the scheme
- The purpose of the processing that takes place within the scheme
- What processing takes place
- What personal data is being processed
- Where the data comes from
- To which parties the data is passed on to
- When the data is deleted

You can also read about your rights on Borger.dk under the individual schemes.

2.2 Recruitment and HR

As Data Controller, ATP also processes data on candidates for available jobs in the ATP Group and about its employees. If you apply for a job at ATP, then in connection with the application process you will be notified of how ATP processes your personal data in connection with the recruitment process. If you should be hired, then in connection with the signing of the employment contract you will be notified of how ATP processes the personal data of its employees, from where data is collected, to whom data is transferred and your rights, etc. This information is also available at all times on the internal employee portal.

2.3. Sending of newsletters

If you want to subscribe to one of the newsletters from the ATP Group, for example via www.atp.dk, www.pensionforalle.dk, the 'borgerpanel' on borger.dk or newsletters from ATP's schemes via Virk.dk, then in connection with your signing up for them you will be informed of what data processing takes place. You will also be asked to give your consent. Your rights in that regard will be stated in the information provided.

2.4 Contacting the ATP Group

ATP aims to make the processing of your personal data as confidential as possible, and therefore you should never send a regular email with information on your case to an ATP email address. If you send an unencrypted email this is equivalent to sending a postcard that anyone can read, and there is the risk that unauthorised persons gain access to your personal data. As a general rule, all inquiries should therefore be made via Digital Post through Borger.dk's self-service solution for the relevant scheme. General questions concerning the ATP Group can be sent securely via the [contact form on our homepage](#). The personal data that is processed in connection with that is the information that you write in the contact form in addition to the files that you attach to it. Inquiries are forwarded to the correct recipient internally and deleted when there is no longer a need to store them pursuant to our internal guidelines for the storing of personal data.

If you call the ATP Group, there will in some cases be a recording of the phone call for the purposes of internal training and optimisation of the customer experience. Before the call is recorded, you will be asked to give your consent. Recorded phone calls are deleted after one month.

2.5 Securing ATP's physical buildings

If you visit one of ATP's physical addresses, there will be video surveillance in some parts of the buildings and associated areas. This is, among other things, for the purposes of crime fighting. There will be clearly visible signage stating what company is undertaking the video surveillance of the area and how

the company can be contacted. In the event that video surveillance recordings need to be handed over, for example to the police or in connection with requests to gain access to information, photos and videos and other personal data (such as licence plates) will be masked if they are not relevant to the handover.

2.6 Optimisation of the user experience on the homepage

Personal data is collected when you use our homepage. We use this data to optimise the user experience of our homepage and the tasks that we manage. For more information, [read about cookies on atp.dk](#) (in Danish only).

2.7 Trading financial instruments

Your conversations with employees in ATP's investment division is recorded and stored as ATP is obliged to record and store our telephone conversation with you when concluding trades with financial instruments via the telephone.

3 WHY DO WE NEED TO PROCESS YOUR PERSONAL DATA?

3.1. Public Authority

ATP processes your personal data based on the provisions of the [General Data Protection Regulation](#) and [The Danish Data Protection Act](#). The legal basis for the processing of ordinary personal data is the General Data Protection Regulation's Article 6(1) (e), as ATP as a public authority is legally required to solve a number of tasks. In the event that this is sensitive personal data, for example, information on your health, the legal basis will most often be the General Data Protection Regulation's Article 9(2) (f), as the processing is necessary in order to determine a legal claim, typically in the form of a payment of a service. In addition, ATP's processing is based on the provisions of the Danish Data Protection Act and a special act concerning the scheme that is being administered. On [Borger.dk](#), you can find more information on what data is processed and what legal basis applies for the individual schemes, including what special acts are applicable.

3.2. Consent

In some situations, ATP will ask for your consent to process your personal data. For example, in connection with applying for an available job in the ATP Group, you will be asked to give your consent to the recruitment process, including any potential participation in tests and the collection of references. In connection with subscribing to newsletters, you will also be asked to give your consent to the processing, and we will also ask for your consent in the event that we record phone calls. The legal basis for the processing in these situations is the General Data Protection Regulation's Article 6(1) (a) and Article 9(2) (a).

4 DATA SECURITY IN THE PROCESSING

The ATP Group takes data security very seriously, and we have strict rules for the processing of personal data undertaken by our employees and suppliers. Our data security policy and underlying guidelines must be adhered to, and they state the principles for a correct handling of personal data. We have employees who are specially trained in the rules concerning personal data and IT security, and all employees have been informed of the importance of adhering to these rules. Likewise, there is a great deal of focus on security in connection with the development or acquisition of IT systems. To the extent that ATP uses external suppliers to process personal data, these have been subject to written instructions and control.

5 YOUR RIGHTS

When ATP processes your personal data, you have the following rights:

- You have the right to request access to or rectification or erasure of your personal data.
- You have the right to object to the processing of your personal data and to have the processing of your personal data limited.

- If the processing of your personal data is based on consent, you have the right to revoke your consent at any time. Your revocation of consent will not have an impact on the legality of the processing that took place before the revocation of consent.
- You can submit a complaint to the Danish Data Protection Agency about ATP's processing of your personal data. You can read more on www.datatilsynet.dk and contact the Danish Data Protection Agency via email at dt@datatilsynet.dk or call them on +45 33193200.
- Should you have any questions about the processing and protection of your personal data, you are welcome to contact our Data Protection Officer (DPO), cf. the contact information in Section 1.

There may be conditions or limitations to these rights. It is therefore not guaranteed that you, for example, have the right to erasure in every specific case - this depends on the specific circumstances surrounding the case.

Last updated: 9 March 2021