

Data Ethics Policy

January 2025

1. Introduction

The Data Ethics Policy (hereafter referred to as "the policy") has been prepared to ensure that DLR complies with the rules in the Executive Order on Financial Reports for Credit Institutions and Investment Firms, etc. (the Accounting Order) § 135d, subsection 2.

Companies today handle far more personal data and general data than ever before. Personal data is increasingly processed and stored as documentation requirements for companies grow. This places significant demands on companies and their employees' ability to manage this data.

For DLR, it is essential that employees, customers, partners, and society at large can trust our ethical handling of data, including personal data.

2. Purpose

The purpose of this policy is to establish a framework for how DLR works with data ethics and data use, as well as the principles governing DLR's ethical, responsible, and transparent treatment of data. Additionally, the policy sets a framework for DLR's data-ethical behavior.

This policy is supplemented by DLR's Information on the Processing of Personal Data, Sustainability and Corporate Social Responsibility Policy, and IT Security Policy.

DLR's data ethics policy is based on DLR's customers, internal initiatives, and the wider society. The policy covers the customer data we collect and process as well as all other data DLR may process, including employees' and partners' data, and applies to all employees. Data includes both structured and unstructured data, as well as data generated by DLR through the use and development of technology.

3. DLR's Data Ethics Principles

DLR's data ethics principles are based on the data ethics compass from the Expert Group on Data Ethics.

3.1 Insight

There must be openness and transparency in DLR's data storage towards the individual customer to ensure their integrity. DLR informs new customers about what personal data we collect and store, how it is stored, and what it is used for.

To ensure customers' insight into the data we collect and store, data is processed as structured as possible, ensuring that we always know what data we hold on each customer. Additionally, DLR ensures, among other things, that this data is not stored longer than necessary for the purposes for which the personal data is processed.

3.2 Dignity

It is crucial for DLR that customers and society have great confidence in DLR's ability to store their data. Respect for the privacy of DLR's customers and employees is a fundamental value for DLR, and we safeguard the right to privacy.

3.3 Responsibility

At DLR, we collect and store large amounts of data, including personal information. Therefore, we are conscious of our significant data responsibility and ensure trust in our responsible use of data.

3.4 Equality and Fairness

In DLR's data processing, we strive to create a fair balance, including in customer categorization.

3.5 Progressiveness

As part of the financial sector, DLR's use of data involves technical solutions to deliver financial products and services. DLR's data use also has significant legal and societal implications regarding the obligations and requirements imposed on us.

We collaborate with authorities and fulfill our obligations to make data available when requested. We also work with authorities to combat money laundering and other crimes, reporting relevant information to authorities as needed.

3.6 Diversity

We aim to involve professional groups with different genders, ages, ethnicities, etc., in the development of DLR's technological solutions.

4. Data Collection

DLR collects and stores only the data necessary and that DLR is legally permitted to process. DLR must always ensure that personal data collection is conducted on a lawful basis, such as legislation, agreements, or customer consent.

5. Third-Party Data Processing

In DLR's collaboration with third parties, such as DLR's loan-distributing banks, we ensure that customer data is protected to the same extent as we protect it ourselves.

DLR enters into data processing agreements with relevant third parties and ensures that they comply with DLR's requirements, including the data ethics policy.

DLR does not sell customer data or other data to third parties.

6. Compliance and Employee Training

This policy obliges all leaders and employees at DLR. Leaders have a special responsibility to lead by example and ensure that all employees are aware of and comply with this policy.

DLR prioritizes employee awareness of data ethics, data security, and proper handling of personal data through campaigns and training at regular intervals.

Challenges and dilemmas may arise concerning the handling of personal data. DLR must be able to discuss and resolve these issues across teams and foster a "positive error culture," where mistakes lead to continuous improvement. This culture relies on employees feeling comfortable admitting and pointing out errors.

7. Roles and Responsibilities

The board of directors is responsible for approving this policy. The board regularly reviews, at least annually, whether the policy needs updates.

Reporting on DLR's data ethics efforts is managed by several functions at DLR, including compliance officers, risk managers, and the Data Protection Officer (DPO).

DLR's DPO reports to the board once a year.

The daily work on data ethics takes place in DLR's relevant business areas, responsible for integrating data ethics into daily operations and implementing DLR's data ethics framework and objectives.

DLR recognizes that data ethics considerations may extend beyond legal requirements.

This "Data Ethics Policy" was translated in January 2025 and is based on "Dataetikpolitik" approved by the board of directors of DLR Kredit A/S at its meeting on October 31, 2024. The policy will be submitted for re-approval by the board no later than 24 months from this date.