



Data Ethics Policy

Introduction

In our increasingly digitized world, the responsible and ethical use of data has become a paramount concern. As technology continues to evolve, so does our capacity to collect, analyze, and leverage vast amounts of data. This transformative power brings with it a responsibility to ensure that the ethical dimensions of data usage are not overlooked.

This Data Ethics Policy serves as a guiding framework for EY in Denmark ("EY"), describing the principles and practices that govern the acquisition, handling, and utilization of data. By embracing this policy, we commit to upholding the highest standards of integrity, transparency, and accountability in all our data-related efforts.

Purpose

The purpose of this Policy is to formally state EY's data ethics principles and describe the overall ways of how we process data, making it clear to our clients, employees, and other stakeholders that we are dedicated to protecting and processing data according to the highest ethical standards.

EY's data ethics principles

We continuously make efforts to further embody our data ethical principles of self-determination, human dignity, responsibility, equality and fairness, progressiveness, privacy by design, and diversity in general in separate policies and procedures to support ethical decisions when using data across the value chain and when developing new products and services.

Responsibility

EY emphasizes this responsibility as part of our daily work and through the usage of data, whether it be client data or our own data. Handling such data places demands on the responsibility EY must demonstrate in terms of data usage.

Transparency

At EY, we are dedicated to upholding the highest standards of data ethics and transparency. We believe in the fundamental right to privacy and are committed to being open and honest about our data practices. This transparency statement outlines our approach to handling data to ensure the trust and confidence of our users, clients, and stakeholders.

Data collection and consent

At EY, we understand the importance of privacy and the responsible use of data and our commitment to transparent data practices, ensuring that individuals have control over their data. We believe in empowering our clients and stakeholders to make informed decisions about the collection and use of their data. EY only collects and retains data that is necessary for the stated purpose.



Security

At EY, security of data is an important part to ensure that data from a technical and organizational perspective is handled in a compliant and ethical manner. EY invests considerable time and resources in future state security technologies. EY aligns the information security strategy with the organization's technology product roadmap and maintains a close association with EY technology service offerings. This properly positions the EY organization to address security issues that might otherwise threaten the confidentiality, integrity, or availability of the data that we process.

Compliance

At EY, we are dedicated to upholding the highest standards of data ethics, ensuring the responsible and lawful handling of personal information. This Data Ethics Policy outlines our commitment to meeting and exceeding regulatory requirements and industry standards.

Usage data

EY collects and processes data for the provision of services, internal compliance purposes or as otherwise required under applicable law or professional obligations. EY only collects data that is necessary for the purpose of the processing. If personal data is involved, an assessment will be made during the data collection process to determine whether EY is the data controller or data processor. In the role as data processor, a separate data processing agreement will be entered into between EY and the data controller.

All data is stored in a secure manner and access to the data is only provided on a need-to-know basis.

EY uses metadata only as long as the primary data exists in EY's systems.

EY has established internal rules for data retention. These rules are largely tied to legislative requirements and professional obligations.

Use of third parties

At EY, data collected is processed mainly by EY's employees. However, there may be situations where it is necessary or appropriate to involve a third party in the data processing. In such cases, EY will ensure the execution of a confidentiality agreement with the respective third party, and that the third party only processes the personal data for the agreed purpose and may be required to enter into a data processing agreement.

EY uses other EY Firms, EY Persons and Support Providers who may have access to data in connection with the delivery of Services as well as to provide Internal Support Services. EY shall be responsible for any use or disclosure of data by other EY Firms, EY Persons or Support Providers to the same extent as if EY had engaged in the conduct itself.

“Support Providers” means external service providers of EY in Denmark and other EY Firms and their respective subcontractors.

“Internal Support Services” mean internal support services utilized by EY, including but not limited to: (a) administrative support, (b) accounting and finance support, (c) network coordination, (d) IT functions, including business applications, system management, and data security, storage and recovery, and (e) conflict checking, risk management and quality reviews.

Data sharing outside of EY typically occurs in connection with tasks that involve other EY network firms, where the sharing of data is necessary for the foreign EY firm to perform its part of the overall task for clients. Agreements regulating the processing of client data have been established among all firms in the EY network.

EY does not sell any client data or other data.

New technologies

EY is helping to realize the potential of EY people with AI knowledge and skills. EY brings together an AI ecosystem encompassing a range of business, technological and academic capabilities.

The use of AI is subject to data ethics principles which require responsible and ethical handling of all data. We will continue to engage with regulators and other stakeholders to address key topics, including the responsible use of artificial intelligence (AI) and reporting on environmental, social and governance (ESG) matters.

EY does not use AI for the purpose of unsupervised learning where the result would be something entirely new and where the algorithm will have access to an unlimited amount of data sets leaving it at the discretion of the machine learning algorithm to learn and deliver results on its own.

EY teams adhere to Responsible AI principles in their development and use of AI. EY teams are only permitted to use AI tools in accordance with these principles. It is required that all EY people continuously keep themselves updated on any changes to these principles.

EY people are required to participate in ongoing training in the use of AI. This training covers – not only general skills – but also considerations regarding data security and other ethical matters related to the use of AI.

More information may be found here: [EY's commitment to ethical and responsible AI principles | EY - Denmark](#)

Approval

This Data Ethics Policy has been approved by EY's Board of Directors on 28 October 2025, pursuant to section 99d of the Danish Financial Statements Act (årsregnskabsloven).