#### PRIVACY POLICY

2018-05-25

# ARE YOU AWARE ABOUT THE SECURITY AND PROTECTION OF YOUR PERSONAL DATA?

We at Telia Finance value your trust on how we process your personal data. We want to explain how we process personal data, and that the processing is legal and reliable. This is our Privacy Policy – we will always safeguard your integrity!

## PERSONAL DATA AND HOW WE PROCESS IT

Personal data is information about you that we collect and process in order to maintain a good relationship with you as a customer and provide our services.

## What type of information do we collect?

We collect information about you and our services you use, such as:

- Personal and contact information name, address, email address, telephone number, personal ID number and other identification details. This may also include information on your user ID, password and other information that you have submitted to us.
- Payment information credit and debit card information, billing information, bank account number, etc.
- Information on goods/services information on the goods/services that you have purchased.
- Financial information your income, debts, any other credit and other information relevant to your credit check.
- Historical information your previous purchases, payment and credit history.

#### How do we collect this information?

We collect and store information:

- that you submit personally when you become a customer of ours, and when you communicate with us e.g. when you sign an agreement or contact us for information.
- that is created when you use any of our services e.g. when you visit our website, call us, send an email or use our app.
- that we obtain from other sources e.g. publicly accessible personal registers, registers that are used for credit assessment purposes, and from other partners.
- that is collected due to the use of cookies, pixel tags or similar solutions on our websites that collect information on and from your browser.

The information we collect is dependent on which of our services you use and whether you are a consumer or represent a company.

#### How do we use the information?

We need to process certain items of personal data so that we can provide services to you. We always make sure that we have a valid legal ground for processing your personal data, for example, when we need the data to perform a contract with you, or when we have a legal obligation to process the data.

Your personal data may also be processed on our legitimate interest, when the processing does not comportmize your right to privacy, or when you have given consent for a particular processing operation for a specific purpose.



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The purposes for which we process your personal data, and the legal basis according to which this data is processed, are provided below.

Purpose of processing	Legal basis
Provision of services We process personal data in order to identify you as a customer or user and to manage and deliver orders in accordance with the agreement we have with you. We also process personal data in order to receive payment for services used, for handling invoices and payments, for credit check purposes, to remedy errors and deal with other incidents and for dealing with complaints and claims.	Performance of contract
Other communication on services We process personal data related to your communication with us, e.g. when we send information about our services and get in touch with you on issues relating to our services.	Legitimate interest to maintain cus- tomer relationship and to provide ser- vices related to the contract with you
Development of services We process personal data in order to develop and manage our business, services and processes. For instance, if you call our customer service team, the call may be recorded. This is done so that we can train our staff, improve our voice responses and the way we work in order to help you as effectively as possible. We may also compile statistics for this purpose in order to meet analysis needs.	Legitimate interest to monitor, maintain, and improve our services
Direct marketing We process various types of personal data so that we can market our own and/or local Telia companies' products and services directly to you. We always ask your consent to direct marketing when that is required under applicable laws. You may receive marketing in the post, over the phone, by text message or by email.	Legitimate interest to market our prod- ucts and services or consent
Information security and prevention of improper use of services We process personal data with a view to ensuring the security of all our services, and to detect or prevent various types of illegal use or use that contravenes the terms of service in some other way. We also process this data in order to prevent improper use of services and to detect and prevent fraud, etc.	Performance of contract
Compliance with laws We process personal data with the view to meeting our statutory obligations, for example, in the area of anti-money laudering and terrorism prevention laws.	Legal obligation

### Automated decision-making

We sometimes use automated decision-making, for example, to determine your eligibility for credit before entering into contract with you. You can always request a human intervention in the decision-making, express your point of view, and contest the decision when it has significant effect on you.

Our automated credit decisions are based on your credit history and credit information with us, or available from public sources according to local laws. We may decide not to grant you credit or not to enter into a contract with you based on the credit check result.

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#### You make decisions on your personal data

Some processing of information is based on your consent. We may ask your consent for some types of direct marketing, and for sharing your personal data with our partners and group companies. You always determine the extent to which you grant approval for such processing, or whether you want to withdraw consent that you have previously given.

## How long do we retain the information?

We never retain information for longer than is necessary. Some information is deleted straight away, other information is retained for different lengths of time depending on what the data is to be used for and our obligations in law.

Basic customer data and information related to your customership will be retained for as long as you remain a customer of Telia Finance, and subsequently for a maximum of 24 months after the contractual relationship has come to an end. Exceptions are applicable to data that must be retained by law, e.g. the Accounting Act or the Act on Money Laundering and Terrorist Financing (Prevention).

Calls recorded by customer service are retained for 14 to 28 days.

#### To whom is information issued?

We may submit your personal data to:

Subcontractors and other Telia Company companies that process information on our behalf We hire suppliers in various areas, and in some cases our own group companies as well, to be able to provide our services. This means that they also need a certain amount of information about you as a customer. However, these parties are not allowed to use information about you for any purpose other than providing the service, and on the terms that we specify.

#### **Authorities**

We may submit personal data to the police, or other authorities, based on legal obligation or other valid requests authorized by local laws.

#### Others

If you have specifically consented, we may submit your personal data to companies, organizations or individuals outside Telia Finance in cases other than those specified above.

#### Transfer to third countries

Some suppliers may have parts of their operations in countries outside the EU/EEA (known as "third countries"). If we transfer your personal data to a supplier in any such third country in order to provide the service to you, we will undertake appropriate security measures and ensure that the information is transferred in compliance with all applicable legal requirements. Depending on the situation, we may rely on an adequacy decision of the European Commission that the recipient country offers an adequate level of data protection, or if no such desion exist, may use safeguards such as European Commission's standard data protection clauses.

## How do we protect your information?

We work constantly to safeguard the privacy of our customers. Our security work includes protection for individuals, information, IT infrastructure, internal and public networks, office buildings and technical facilities.

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We pay particular attention to information security in respect of your personal data in order to prevent this data being distributed to third parties or being lost, or to detect such instances. Only the people who need access to your personal data in order to do their jobs are allowed to access it. Processing of personal data is logged and checked systematically. Information is encrypted using generally recognized and secure encryption methods.

## **YOUR RIGHTS**

You have the right to know what we do with your personal data. Your rights are listed below.

### Right to access

You can request a copy of your personal data free of charge. We will respond to your requests without unnecessary delay and within one month. The copy of your personal data will be sent to your registered address.

### Right to rectification

We are responsible for ensuring that the personal data we process is correct, but as a customer you also have the right to supplement your data with information that is missing and relevant. If you discover incorrect information about yourself, you have the right to request rectification of this information. When your personal data is rectified, we will do our best to notify the parties to whom we have submitted the relevant information to let them know that something has been rectified.

#### Right to erasure

Basic customer data and information related to your customership will be retained for as long as you remain a customer of Telia Finance, and subsequently for a maximum of 24 months after the contractual relationship has come to an end. Exceptions are applicable to data that have longer mandatory retention times under applicable laws, such as the Accounting Act or the Act on Money Laundering and Terrorist Financing (Prevention).

As a customer, you have the right to have your personal data erased without unnecessary delay in any of the following situations:

- If the data is no longer needed for the purposes for which it was processed.
- If the processing of this data is based solely on your consent and you withdraw this consent.
- If the data is processed for direct marketing purposes and you oppose the processing of your data.
- If you oppose the processing of your data under legitimate interest legal ground and there are no legitimate reasons that outweigh your interests.
- · If your personal data has not been processed in accordance with the applicable laws.
- If your personal data needs to be deleted in order to meet a legal obligation.

If your personal data is erased, we will do our best to notify the parties to which we have submitted the personal data to let them know about the deletion.

#### Right to object

You have the right to object to any processing of your personal data performed by us based on a legitimate interest. You must then specify the processing operation to which you object. We will stop the processing unless we have a compelling interest to continue the processing. If personal data is processed for direct marketing purposes, you have the right to object to this data being processed at any time.

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## Right to restriction

You have the right to request temporary restriction of the processing of your personal data. Processing may be restricted in the following situations:

- When you of the opinion that your personal data is not correct and you have thus requested that we correct it. You can then request restriction of the processing of your personal data while an investigation is ongoing.
- When the processing operation is illegal, but you object to your personal data being deleted and request restriction of the use of the data instead.
- When you need your personal data to be able to establish, assert or defend legal claims, even if we no longer need your personal data for the purposes of our processing operation.
- When you have objected to the processing of your personal data, we are allowed to continue to process your personal data while we process your request.

If the processing of your personal data is restricted temporarily, we will do our best to notify the parties to which we have submitted the personal data to let them know about the temporary restriction.

### Right to data portability

You have the right to obtain and use elsewhere personal data that you yourself have submitted to us and that we process on your consent or for the performance of contract, in order to use it elsewhere (also known as porting), e.g. transferring your data to a different operator or IT environment.

You have no right to relocate your data if we are processing it based on other legal grounds than consent or performance of contract, or if you have not originally provided the data to us yourself.

#### Notification of infringement (complaints)

If you are of the opinion that your personal data is being processed in contravention of applicable regulations, you should notify us of this as soon as possible. You may also submit a complaint to your <u>local data protection authority</u>.

#### **Damages**

If you have suffered harm due to your personal data being processed in contravention of applicable law, you may be entitled to damages.

#### Information about cookies

Our websites use cookies. These are small text files that are stored on your computer when you visit a website. Cookies are used for certain functions that improve our website for the user or provide us with statistics about the use of the site. Our websites provide more information about what cookies we use and why.

## **MISCELLANEOUS**

This Privacy Policy is applicable when you use services provided by Telia Finance AB when you visit our websites. It is not applicable to any other company's website or services, even ones that can be accessed via Telia networks or services.

This Privacy Policy may be updated. Current version is available on <a href="https://www.teliafinance.com/en/privacy">https://www.teliafinance.com/en/privacy</a>. Earlier versions of the policy can be accessed at the same page.



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## **CONTACT INFORMATION**

Data controller Telia Finance AB Stjärntorget 1 169 94 Solna Sweden

## Data privacy officer

Our data privacy officer (DPO) ensures that your data is processed legally by us. You can contact our DPO by email:

dpo-tc@teliacompany.com

## Contact for exercising your rights

Current information about your local customer service can be found on

https://www.teliafinance.com/en/privacy.