Privacy policy for Telia Sverige AB

We are Telia Sverige AB (org. nr 556430-0142), (hereafter 'Telia'). In this Privacy policy we describe how we, as the controller, process and protect your personal data (hereafter 'data').

Telia recognizes that the protection of your personal data is extremely important. Therefore, we protect the privacy of every data subject with the utmost responsibility and care.

When processing personal data, we comply with the General Data Protection Regulation (GDPR), the Data Protection Act 2018:218[1], The Electronic Communications Act 2022:482[2] and other directly applicable legal acts regulating the processing of personal data.

1. What is in this Privacy policy?

This Privacy policy applies to the processing of personal data of individuals, regardless of whether you are a consumer or business customer. In addition, Telia may have service-specific privacy policys, which describe the processing of personal data in the context of a specific service. These can be found along with the specific services that we provide.

This Privacy policy sets out:

- how we collect personal data,
- what personal data we process,
- for what purposes, based on which legal grounds and for how long we process personal data,
- how we protect and safeguard personal data,
- to whom we disclose personal data,
- what rights you have regarding the processing of your personal data and how you can execute these rights.

This Privacy policy does not apply to the processing of personal data processed by other companies when you are using their services or websites, even if they were accessed through Telia's communications network or services.

2. Definitions

The below terms are used in the Privacy policy as follows:

Automated decision making	are decisions made by technological means without human involvement
Customer	a subscriber, buyer, or user of our services

[1] Lagen (2018:218) med kompletterande bestämmelser till EU:s dataskyddsförordning.
[2] Lagen (2022:482) om elektronisk kommunikation.

Data subject	an identifiable individual who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that individual.
Personal data	data that either directly or indirectly can be associated with a data subject.
Services	all products and services provided by Telia.
Telia companies	companies that belong to Telia Company. More information is available on the following site About the company - Telia Company.

3. How do we collect your personal data

Telia offers a wide range of services. The information we collect about you depends on the services you order and/or use and the data you provide when you order services or register on our websites, applications and other platforms.

You are not obliged to disclose any personal data to Telia, but please note that if you choose not to disclose your personal data, we will not necessarily be able to provide you with all our services or offer relevant products/solutions to you.

Telia collects and further processes your personal data from the following sources:

Directly from you
This data is derived from you, when you do business with us, buy or subscribe to our services, or when you register with or log in to our services, visit our website, subscribe to our newsletter, reply to our customer satisfaction survey or contact us by phone, email or chat.

Generated data
This data is generated when you use our communication networks or our services, i.e., when you are making phone calls, sending messages (SMS), browsing the Internet, using TV and entertainment services, visiting our websites etc.

Derived data
This data is created based on your personal data, such as conclusions about your possible interests or consumption habits, made e.g., by means of analytics for direct marketing purposes.

Other data
This data is obtained from other service providers, public authorities, or publicly available registers, such as SPAR, banks, or credit bureaus (for credit-check and solvency assessment).

We also process personal data received from other Telia Company companies in accordance with what is stated in this Privacy Policy.

4. What Personal data do we process?

Personal data is data that is directly or indirectly linked to you as a private individual. You can be a customer or a user using services under a customer's contract, such as business customer employees or private customers family members.

For the sake of clarity, we group your personal data into the following data categories:

Anonymous data
We process anonymous or aggregated data that is not associated with you as an individual. Such data is not personal data according to GDPR.

Basic personal data
Basic personal data is any information relating to an identified or identifiable individual that does not fall under any other data type. For example: personal identification information (name, personal ID code, date of birth), contact information (address, email), information related to ordering and provision, information related to payments, consents, and objections that you have provided, your communication with Telia, marketing data, images and videos captured by CCTV etc.

Children's personal data
Telia processes children's personal data to the extent permitted by law, when appropriate. Telia makes reasonable efforts to ensure and verify that the custodian of a child under the age of 13 has agreed to the processing of personal data, considering the available technology and the privacy risks related to the processing.

Content of communication
Content of communication refers to information exchanged between two communicating parties using an electronic communications service, e.g., the content of phone calls and emails, SMS and MMS content.

Device tracking data
Device tracking data consists of data collected by means of cookies and similar tracking technologies in connection with web or mobile browsing. For more information about the cookies used by Telia please see the cookie notice and the cookie table on our website https://www.telia.se/cookie-policy.

Location data
Location data refers to the geographical location of a person and (or) terminal equipment (e.g., GPS coordinates, base station location). Location data other than traffic data may be processed for the purpose of the provision of value-added services and to the extent necessary for the provision of these services.

Location data does not refer to your place of residence, service provision or invoicing address, contact address, etc. That information is part of your **basic personal data**.

When location data is used for the purpose of the conveyance of communication on an electronic communications network or for billing purposes it is **traffic data**.

Special categories of personal data
Special categories of personal data include racial or ethnic origin, political views, religious or philosophical beliefs or trade union membership, genetic data, biometric data used to as a unique identifier of a individual, health data or data on sex life and sexual orientation of a person.

We do not retain or collect such data, unless you have provided this information to us yourself or provided us with an explicit consent to process such personal data.

Traffic data
Traffic data is the data generated using communications services. It is necessary for the conveyance of a communication through the electronic communications network and for the billing thereof. This data reflects your activities when you are using communications services and communications network at a particular time and place. For example, the number A calls the number B at a specified time, at a specific location, and the call has a certain duration.

Non-personal communication data is processed to provide services and to compile invoicing. This datatype refers to communication data obtained from the use of communications services in our network by roaming service clients, clients of other operators or internet service providers, i.e., individuals who have not been authenticated by Telia.

Telia as a communication operator
Telia provides services as a communication operator for a specific network or real-estate owner. In these cases, we process personal data regarding address and name and telephone number of the person registered in the apartment. We process this data for as long as we are the communication operator for the network and receive this personal data from the real-estate or network owner. We share this personal data with the service provider that the apartment owner chooses.

5. Legal grounds, purposes, and retention times for processing personal data

We collect and process your personal data to the extent that it is needed for specified and legitimate purposes and only if necessary to fulfil the purpose. We process your personal data for as long as necessary and no longer than needed, taking into account the maximum retention times presented below. It should be considered that in certain cases, exceptions apply. For example, some automatic retention times do not apply in case of debts.

Telia ensures and takes all necessary measures to ensure that outdated or unnecessary information is not stored and that personal data and other information about you is constantly updated and correct.



Telia processes personal data based on four legal grounds (legal obligation, performance of contract, legitimate interest, and consent). The different legal ground grants you different rights and opportunities to influence and make choices regarding the processing of your personal data.

5.1. Purposes based on the legal ground 'Legitimate Interest'

We process your personal data for different purposes by using the legal ground *legitimate interest*. When we process your personal data on this legal ground, we have concluded that there is a legitimate purpose for processing interest, that the processing is necessary and that the processing is within your reasonable expectations. We have also balanced our business interests with your rights.

For your rights, see "Your privacy choices and rights".

Purpose and legitimate interest assessment	**Data categories with examples of attributes**	**Max. retention time**
Direct marketing For *direct marketing* purposes, we have concluded that this is an effective marketing channel and that individuals may have an interest in receiving offers through direct marketing channels.	Basic personal data *Name, address, phone number, email address and Telia ID*	12 months after end of relationship or 5 years after marketing activity
Basic profiling activities Basic marketing processing (i.e., based on data from our systems). For *basic marketing and basic profiling* purposes, we have concluded that by providing customers with targeted and tailored marketing, our customers will receive more relevant marketing communication and that individuals may have an interest in receiving tailored marketing.	Basic personal data *Name, address, phone number, email address, Telia ID and service account number.*	12 months after end of relationship or 5 years after marketing activity
Credit-check to understand if customer is considered suitable to receive services and/or equipment. For *credit-check* purposes, we have concluded that we need to manage risks related to revenue loss and that even though some customers may experience a negative outcome, this practise also benefits customers from further increasing bad debt.	Basic personal data Such as payment history and other credit-related information where necessary for credit assessment or risk management, including n*ame, social security number, order amount*	0 months (data is only processed, not stored)

Customer care and relationship (inquiries, communications, and Customer service). For *customer care and relationship* purposes, we have concluded that the processing is highly beneficial to provide customer care, to improve our customer care services, and to measure their efficiency at the same time as the customer will have an improved customer experience where their needs will be met faster and in a more efficient way.	Basic personal data *Name, social security number, Telia ID and service account number*	36 months after creation
Business reporting purposes, i.e., processing personal data for statistics and analytics to detect trends and correlations. For *business reporting* purposes, we have concluded that the processing will support us in creating more relevant offerings and general recommendations that may benefit our customers.	Basic personal data *Address, Telia ID and service account number*	36 months after creation
Revenue assurance purposes, i.e., identifying and detecting unbooked or lost revenue. For *revenue assurance* purposes, we have concluded that the processing is of fundamental importance to ensure Telia's revenues and that's this processing is in the interest of our customers and our owners.	Basic personal data *Name, social security number, order amount*	24 months after creation
Information security purposes, e.g., Anti-DOS operations, email spam and virus scanning. For *information security* purposes, we have concluded that the processing benefits Telia and our customers, the economy and society at large.	Basic personal data	12 months after creation *Video surveillance*: 60 days
Fraud detection purposes, e.g., identifying misuse, fraud prevention in sales, and identifying customers. For *fraud detection* purposes, we have concluded that this processing has benefits for Telia, our customers, users, the economy, and society at large, when avoiding damages.	Basic personal data *Name, address and social security number*	36 months after resolving
Service and product improvement For *service and product improvement* purposes, we have concluded that this processing is needed for Telia to provide services from a business and security perspective.	Basic personal data *Name, address, Telia ID and products used*	24 months after end of relationship *Voice recording: 3-28 days* *Basic personal data in chat conversations:* *2 months*
Development and maintenance purposes, i.e., for developing and maintaining our systems and networks. For *development and maintenance* purposes, we have concluded that this processing is generally expected to receive the provided services.	Basic personal data *Name, address, Telia ID and products used*	36 months after creation



5.2 Purposes based on the legal ground 'consent'

Telia processes your personal and traffic data with the legal ground *consent*. Prior to the processing we will request your consent, inform you of purpose and how you, at any time, can withdraw your consent.
For more information on how to exercise your rights, see "Privacy choices and rights".

Purpose	**Data categories with examples of attributes**	**Max. retention time**
Processing of special categories of personal data for specific purposes as described under each service and purpose.	Special categories of data *As described under each Service and processing request.*	As described under each Service/ until consent is withdrawn.
Metadata marketing, i.e., marketing profiling, follow-up of marketing campaigns, tracing sales and similar. Extensive profiling activities (e.g., for marketing purposes) evaluating, analysing, or predicting behaviour, interests, location, etc.	Basic personal data Traffic data *Title-, category-, source-, date-, start and end time for streaming, outgoing and incoming phone number, timestamp for transmission, length of transmission, operator, IMEI, IMSI, data sent, geographic location for mobile device*	36 months after end of relationship but no more than 5 years in total/ after consent has been withdrawn Traffic data: 10 months Internet traffic data: 6 months Location data: 2 months
Service and network improvement, e.g., creation of new features, products and/or services.	Traffic data *Outgoing and incoming phone number, timestamp for transmission, length of transmission, operator, IMEI, IMSI, data sent and geographic location for mobile device*	24 months after end of relationship/ after consent withdrawal Traffic data: 10 months Internet traffic data: 6 months Location data: 2 months
Publication of your personal data in publicly available phone directories.	Basic personal data *Name, phone number, address*	Until consent is withdrawn
Processing of content for a specified purpose, e.g., provision of a specific service to an end-user.	Basic personal data Traffic data *As described under each Service and processing request.*	As described under each Service/ until consent is withdrawn.

5.3 Purposes based on the legal ground 'performance of a contract'

We process your personal data as it is necessary for us to perform under a contract or to take steps prior entering a contract. For more information on how to exercise your rights, see "Your privacy choices and rights".

Processing purpose	**Data categories with examples of attributes**	**Max. retention time**
Credit-check (automated), when necessary to enter or perform a contract. *More detailed information about automatic decisions and provision of credit rating can be found below.*	Basic personal data *Name and social security number*	0 months after end of relationship
Order management and product and service delivery e.g., creating a contractual offer when requested by the individual.	Basic personal data *Name, social security number, Telia ID, address, email address, phone number and service account number*	36 months after creation *Call recordings to verify orders: 3 months.*
Customer administration, e.g., establishing and terminating customer relationships, updating customer data, submitting formal notifications, and responding to enquires	Basic personal data *Name, social security number, Telia ID, product description, contract number, address, email address, phone number and service account number*	36 months after end of relationship
Communications transmission, i.e., processing necessary to achieve transmission of communications when providing electronic communications services.	Basic personal data Traffic data *Name, address, phone number of caller/receiver and IP-address,*	0 months (data is only processed for as long as necessary for the purpose in question)
Service quality assurance, i.e., ensuring quality of services in accordance with contractual obligations	Basic personal data *Name, social security number, Telia ID and product description*	36 months after creation
Billing and payment, i.e., calculating payments, billing, issuing invoices, collecting payments and debts. Processing of metadata necessary for billing, calculating interconnection payments (incl. carrier and other wholesale payments).	Basic personal data *Name, social security number, address, invoice number, invoice date, invoice amount, payment date, payment amount and payment category*	Minimum 24 months after payment and maximum 24 months after end of relationship
Information security, e.g., maintaining and restoring security of electronic communications networks and services, ensuring information, asset, customer, and personnel security. Processing of metadata necessary for detecting or stopping fraudulent, or abusive	Basic personal data Traffic data *Email address, caller's and receiver's telephone number.*	12 months after resolving *IP-addresses: 10 days* Traffic data: 10 months Internet traffic data: 6 months Location data: 2 months

use of, or subscription to and misuse of, electronic communications services.		
Incident management, e.g., resolving incidents and issues related to the performance of the contract with the customer.	Basic personal data *Customer notification information and information related to the incident*	24 months after resolving

5.4 Legal obligation

Telia is to fulfil applicable legal obligations, including obligations related to personal data processing. Such processing includes retaining data for and answering law enforcement requests and enquiries and complying with court orders. Telia is also obliged to process personal data for regulatory reporting to national regulatory authorities and for fulfilling obligations set for significant market players by the national regulatory authority.

Telia is subject to certain laws and regulations related to providing financing services, such as fulfilling the know your customer obligations, mandatory customer identification and credit-check obligations to fulfil the responsible lending requirements. In addition, Telia needs to process personal data to fulfil anti-money laundering obligations.

Data processing purpose	**Data types with examples of attributes**	**Maximum retention time**
Service quality assurance, e.g., to convey the message in accordance with our legal obligations.	Traffic data *Outgoing and incoming phone number, timestamp for transmission, length of transmission, operator, IMEI, IMSI, data sent, geographic location for mobile device.*	0 months (data is only being processed for the specific purpose and is not stored)
Accounting, e.g., valuation of charging records, accumulation and processing of charging records, processing for payment of bills, etc. as explicitly required by accounting legislation in Sweden.	Basic personal data *Name, social security number, Telia ID, phone number, service account number, invoice number, invoice date, payment date, payment amount payment category, invoice amount*	7 years after end of calendar year in which the accounting year was closed.
Mandatory monitoring, e.g., supplier audits, DPO audits and testing, network-based security measures such as firewalls, IDS, AV and monitoring the network for illegal traffic or patterns.	Basic personal data Traffic data *Phone number, title, category, source, date, start and end time for streaming, outgoing and incoming phone number, timestamp for transmission, length of transmission, operator, IMEI, IMSI, data sent,*	0 months after resolving Logs: 1 year after creation

	geographic location for mobile device	
Mandatory retention for law enforcement purposes.	Traffic data *Name, social security number, phone number, outgoing and incoming phone number, timestamp for transmission, length of transmission, operator, IMEI, IMSI, data sent, geographic location for mobile device*	Traffic data: 6 months Internet traffic data: 10 months Location data: 2 months
Court orders, e.g., an order that requires us to provide certain data.	Basic personal data *As per request*	12 months after complying with the order.
Significant Market Power (SMP) obligations (telecommunication operators are required to share data with other operators).	Basic personal data Traffic data *Case specific*	Case specific
Authority and individual reporting, e.g., providing data subjects right to access report or reporting personal data breaches.	Basic personal data Traffic data *Name and social security number*	24 months after report created
Mandatory Customer identification, for example to prevent money laundering during provision of a financing service.	Basic personal data *Name and social security number*	24 months after end of relationship

6 Profiling for marketing purposes

6.1 What is meant by profiling for marketing purposes?

Profiling for marketing purposes refers to data processing where we process your data using statistical, mathematical, or predictive analysis methods for creating various links, probabilities, correlations, patterns, models, marketing profiles, etc. As a result, we can predict or derive your expectations, preferences and needs regarding the consumption of goods and services offered by us.

Profiling always includes some margin of error because the correlations are based on mathematical and statistical procedures. This is an inherent characteristic of profiling, and, at the same time, the main source of risk to individuals' privacy, namely because of the possibility of occurrence of two kinds of error: 1) wrongly assigning a person to a category; 2) excluding a person from a category who in fact belongs to it.

The maximum retention time for the processing of personal and traffic data for marketing purposes is 5 years after marketing activity during customer relationship and not more than 2 years after end of the customer relationship as described above.

6.2 How do we use marketing profiling?

- **We create and assign customer types or profiles to data subjects**
  We analyse customers' demographical data (age, gender), service usage data and other aggregated data by using several different, internationally recognized statistical analysis

methods to conduct profile analysis, to develop different customer segments, types, or profiles. Based on the identification data and probability assessment used in the profile analysis, we can determine the specific customer segment, type, or profile (e.g., technology savvy customer) and use this assessment for different marketing decisions (for example displaying personalized content and advertising in the e-environments).

- **We assess behaviour and interest based on the customer's journey**
  In this case we can analyse and use customers' data related to the use of services, website visits and other data concerning purchasing behaviour and consumption, as well as various methods of statistical analysis and profile analysis, to derive customers behaviour patterns, models, and customer types. As a result, we are provided with a probability assessment on how interested a specific customer would be in ordering and using a specific service.

- **Location-based offers**
  In this case, we analyse customers' data on used communications services in the area of a specific event and use statistical analysing methods and profile analysis to decide whether to send a marketing offer or message to a specific customer or not.

We are careful when performing profiling to avoid irrelevant offers or other unwanted marketing communications. We can use the services of marketing profile companies to aid us in creating a marketing profile for our customers.

You have the right to object to the processing for marketing purposes, see below.

6.3 The right to object to the processing for marketing purposes

You have the right to object to the processing of your personal data for marketing purposes, including profile analysis for marketing purposes. This can be done by logging in via www.telia.se or in the application MittTelia or by calling customer service at 90 200.

This can even be done by submitting a letter to Telia. You need to submit your full name, social security number and contract number. The letter should be sent to:

Telia Sverige AB
Mina Rättigheter – Privat
Svarspost 108317743
978 00 Luleå

Another way of discontinuing marketing activities is by clicking ”unsubscribe” in the email or by opting out in accordance with the information provided in the marketing communication.

7 Automated decision making

Automated decision making is a means of processing your personal data where decisions are made by technological means without human involvement. An automated decision can be based on different processing activities, for example, profiling, and these processing activities need to have appropriate legal grounds in place. If there is any human intervention involved, the processing is not considered being automated (e.g., if a person reviews a credit-check prior to the decision).

In case you are not satisfied with the automated decision made by Telia regarding you, you have the right to 1) ask Telia for a human intervention instead of the automated decision making, 2) express your point of view and 3) to contest the decision.

Telia uses the legal ground *performance of contract,* as explained above, when processing personal data within the scope of automated decision making. Telia bases for example a credit decision on an automated decision-making process. These decisions are based on Telia's or Telia company's customer relationship information or if, in addition to the processing of customer data, Telia considers it necessary to use external credit-check data. Such checks may also be made regarding individuals whose credit history is not available, for example due to a long stay abroad. In device sales, we use third-party information to support the credit decision.

The credit decision is based on the payment history of a customer in a contractual relationship with Telia or other Telia company (invoice information, invoice payment date, due date, name and social security number). We also use information about open receivables (amount, duration). The content of the credit decision is also affected by the credit check requests obtained in a short time interval, the number and value of the services to be purchased and the age of the customer. The use of age, like other criteria, is associated with a calculated estimate of the general amounts of credit transactions. Credit decisions are made during a purchase or order transaction.

The credit rating results 'new' and 'negative' result in the non-receipt of credit, and while signing up for a service, Telia may require the customer to provide additional collateral (e.g., surety, guarantee, deposit), as well as make an advance payment (e.g., the credit limit is exceeded, or the customer's creditworthiness assessment is insufficient). The results 'satisfactory' and 'positive' will generally result in automatic permission for subscribing to a service.

8 How do we safeguard your personal data?

8.1 How we safeguard your data and how we keep children safe

Safeguarding your personal data is of the utmost importance to us why we implement necessary organisational and technical security measures to ensure the integrity, availability, and confidentiality of the data. These measures include the protection of employees, information, IT infrastructure, internal and public networks, as well as office buildings and technical equipment.

The purpose of information security activities is to implement the appropriate level of protection of information, risk mitigation and risk prevention. We ensure the security of the communication network and the confidentiality of the message contents and form of messages sent by you, as well as the time and method of sending them, in accordance with terms and conditions that apply to Telia services and with legislation. The measures required for this are implemented by Telia's internal security regulations.

Our employees are subject to data confidentiality and protection requirements. Personal data protection training is provided to them, and employees are liable for fulfilling their obligations. Also, our partners are required to ensure that their employees comply with the same rules as we do, and their employees are liable for meeting the requirements for the use of personal data.

Learn more about Telia's information security policies in general.

To keep children safe and to prevent the distribution of Child Sexual Abuse Material, we co-operate with the Swedish police to block access to websites that portray Child Sexual Abuse Material.

8.2 How you can safeguard your data

Prior to disclosing your personal data to a third party or entering it somewhere, consider who will receive the data and how securely it will be stored. In the case of communication and internet services, it must be considered that by enabling access to your data (e.g., on our self-service), either due to your own negligence or any other reason, you will be providing access to call logs, service details, invoicing information, and data of associated persons.

If you suspect that your personal data has been processed contrary to our privacy policy or that your information has been disclosed to strangers, be sure to inform us as soon as possible by contacting us using the below described methods. This way we can solve the situation as quickly as possible and help minimize potential losses.

9 To whom do we disclose your personal data?

Below you can find different recipients to whom we disclose your personal data.

- **Telia Companies**

We share data within Telia companies to get an overview of our customers commitments with all Telia companies. At an aggregate level, i.e., when personal data is merged with other customers' data, that information is used for analytics, including following up on the distribution of customers between different companies within our group.

If a data subject has not objected to the processing of customer data for marketing purposes, the overall picture of their involvement with Telia companies is used for personalized communication and marketing to them.
If a data subject has agreed to the use of traffic data for the improvement of services and networks and/or marketing, that information is used when we prepare offers to them.

- **Our partners working for us**

In various areas, we hire suppliers and, in some cases, other Telia companies, to be able to deliver services. These parties need information about you so that we can deliver our services to you. However, these parties are not entitled to use your personal data for any other purpose other than to provide the service or on the terms we specify. Telia's subcontractors process personal data based on our assignment. When using subcontractors, we ensure that the processing takes place in accordance with this Privacy policy. The processors referred to herein include, for example, IT service providers, equipment servicing partners, and marketing offices performing marketing efforts on our behalf.

A list of partners we use for direct marketing practices can be found here: https://www.telia.se/privat/om/telefonforsaljning.

- **Other telecommunication companies or service providers**

We disclose your personal data to other telecommunications companies or service providers that provide or are committed to providing you services, for example, for invoicing purposes or in the event of a fault or disturbance.

When calling a telephone number of other Swedish or foreign telecom operators, you will leave our communications network and use the roaming services provided by other telecommunication operators (e.g., when travelling abroad) and these are entitled to collect and process your personal data and receive your personal data from Telia.

When, for example, you subscribe to Spotify, TV-services or other services provided through Telia, the service provision requires disclosure of your personal data to the third-party service provider. If a device is sent for service, the warranty procedure requires disclosure of your personal data to the manufacturer.

Personal data is also disclosed in association with electronic identification or electronic signing to identification broker services or service providers whose services are accessed or logged in by means of Telia's identification service or identification device (such as BankID) to verify your identity or to sign electronically. We disclose your personal data to service providers and identification broker services in the extent required by the intended use and as allowed or required by law. During authentication and electronic signature, name, electronic unique identification number and/or personal identity number is disclosed to the service provider and the identification service broker. If you use the payment feature of your mobile subscription, i.e., you purchase a ticket to be paid on your phone bill, Telia may process the personal data needed to execute the payment transaction and disclose the subscription number to the service provider from whom you purchase the service using the payment feature.

When Telia discloses your personal data to other telecommunication companies or service providers, the processing and collecting of your personal data is carried out in accordance with the contractual terms and privacy policies of the respective telecommunications company or service provider. This Privacy policy does not apply to the processing of your personal data by these parties. Telecommunications companies or service providers can in their turn transfer personal data to parties outside the European Union (EU) or the European Economic Area (EEA). If necessary, we recommend that you contact them for more information.

- **Competent state authorities and other public authorities**

We disclose personal and traffic data to security and surveillance authorities, including the police, prosecutors, courts, emergency centre (112) if the corresponding obligation arises from the legislation. For example, for the purpose of preventing, investigating, and detecting criminal activities or to provide the emergency service with necessary information we disclose personal and traffic data to the extent required by the law and in accordance with a predefined procedure.

As an electronic communication network and service provider we are legally obliged to provide the National Defence Radio Establishment (FRA) information (intelligence) from electronic signals that cross our borders. You can read more on www.fra.se.

- **Other third parties**

We disclose your personal data to other third parties with your consent, for example for publication in public directory inquiry services (electronic directory services or telephone directory).

In relation to legal proceedings or at the request of an authority based on applicable law or court order or in connection with a trial or authority process your personal data can be disclosed. We can, for example, disclose your personal data to a copyright holder or their representative.

Telia as a creditor has the right to assign the right of a claim to another party who may take over the claim. Such a transfer does not require the consent of the debtor and the debtor can be notified either by the old, or the new creditor. The transfer of debtors' data is subject to proper implementation of the data protection requirements laid down by law.

We disclose your personal data to a data subject when providing a subscriber with a connection-specific itemization for an invoice.

We also disclose personal data to third parties in connection with mergers and acquisitions and various business transaction and transfers.

10 Third country transfers

Our partners who process personal data on our behalf are sometimes located outside the European Union (EU) or the European Economic Area (EEA). When transferring personal data outside the EU or EEA, we ensure by means of agreements (e.g., using the EU Commission's standard contractual clauses) or otherwise (an adequacy decision by the European Commission) that the transfers are implemented as required by law. In addition, we ensure that personal data remains protected regardless of whether they are transferred outside of the EEA.

Telia assesses risk factors related to the transfer of personal data to third countries by conducting a transfer impact assessment (TIA). Telia uses TIAs to verify, on a case-by-case basis, whether the law of the third country ensures adequate protection of personal data when transferred. A TIA is also conducted when there is no transfer of personal data to a third country, i.e., outside of the EEA, if personal data is processed by an EEA registered company owned by a non-EEA parent company, or a non-EEA company. By conducting a TIA, we can identify whether an essentially equivalent level of protection as provided in the EEA countries is afforded. We



collaborate with our sub-processors to gather sufficient information to perform and complete TIAs. Based on the law or practices of the third country and the effectiveness of the appropriate safeguards we review whether and which supplementary measures should be implemented. In determining which supplementary measures are most appropriate, we assess the effectiveness of such measures in the context of the transfer or other applicable scenario, the third country law and practices and the transfer tool used.

The European Commission's list of countries outside of the EU that offer an adequate level of data protection can be found here.

The European Commission's standard contractual clauses can be found here.

The Swedish Data Protection Agency's webpage on international transfers can be found here.

11 Your privacy choices and rights

11.1 The right of access

You have the right to be informed about whether your personal data is being processed nor not. If your personal data is being stored you have the right to obtain a copy of your personal data and information regarding:

1. Categories of personal data being processed
2. What the personal data is used for
3. The retention times
4. Recipients to whom the personal data has been or will be disclosed
5. The origin of the personal data

To request access to your data you can submit a request when logged in at www.telia.se, MittTelia or by calling 90 200, see below for further details. You need to properly authenticate yourself. If less than six months have passed since your previous request, Telia has the right to charge you for the request. The information will be sent to your address or be made available via your own page at www.telia.se or in the MittTelia application.

11.2 The right to consent

If the processing of personal data is based on consent, you have the right to withdraw consent at any time.
This can be done by logging in on www.telia.se or Mitt Telia. There you will be able to see what you have consented to, how you can withdraw your consent and how you can consent to further processing of your personal data. You can also call customer service at 90 200 or submit a letter to:

Telia Sverige AB
Uppdatera samtycke – Privat
Svarspost 108317743
978 00 Luleå

Upon receipt of the data subjects consent withdrawal, Telia will start to implement changes immediately. It will take up to two weeks to stop processing your personal data based on consent as Telia needs to take action to execute the request. It is worth noting that application or withdrawal of consent does not have a retroactive effect.

11.3 The right to rectify data

You have the right to obtain the rectification of incorrect or inaccurate personal data concerning you and to have incomplete personal data completed. This can be the case for example, if, upon access to your personal data, you determine that the data is incorrect, incomplete, or inaccurate.

11.4 The right to object to the processing

You have the right to object to the processing of your personal data when your data is being processed based on the legal ground *legitimate interest* (as defined above). If Telia agrees to the objection, we will stop processing your personal data for the specified purpose. If we have a strong and legitimate reason to continue processing your personal data despite the objection, we will not agree to the objection.

You have an absolute right to object to Telia's processing of your personal data for direct marketing and we will stop processing the data if you object to this processing. This right cannot, however, be used in a situation where Telia is required to compile, submit, or defend a legal claim (e.g., when we believe that a person is on breach of contract and therefore must turn to court or other law enforcement agency to protect our rights).

You can exercise your rights when you have logged in through www.telia.se or by opting out from direct marketing in accordance with the information provided in the marketing communication.

11.5 The right to data portability

You have the right to receive your personal data that you have submitted to Telia that is processed based on *consent* or *performance of contract* (as defined above). You are entitled to receive your personal data in a structured, commonly used, and machine-readable format. You also have the right to transfer the data to another controller.

Telia will provide access to your personal data, or have it transferred directly to another service provider (or data controller), in a structured, commonly used, and machine-readable format (provided that the other service provider has the capacity to receive the data in such format).

11.6 The right to be forgotten

You are entitled to erase your data in certain circumstances, for example, if

(i) the processing of personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed,

(ii) you initially consented to the use of your data but have now withdrawn your consent and there is no other legal ground for the processing,

(iii) the processing of your personal data is for the purpose of direct marketing and you do not consent
(iv) you have objected to the processing and there is no overriding legitimate ground for the processing (your interests outweigh our interests),
(v) it was identified that your data have been unlawfully collected and (or) further processed,
(vi) Telia has a legal obligation to erase the data, or
(vii) the data was collected from you as a child for an online service.

If we erase your personal data at your request, we shall inform those to whom the personal data has been disclosed. However, this does not apply if it proves impossible or entails a disproportionate effort. You have the right to obtain information about the recipients to whom the data has been disclosed.

11.7 The right to restriction of processing

Telia is to restrict the processing of your personal data in certain circumstances. For example, if you have requested to rectify your data or made an objection to your personal data processing, you may ask to temporarily limit the use of your data while your request is being considered. You may also ask Telia to limit the use of your data rather than delete it if Telia processed your data unlawfully, but you do not want it deleted, or Telia no longer needs your data, but you want Telia to keep it in order to create, exercise or defend legal claims. However, you should consider that this right requires a very precise formulation of the purpose and may, in some cases, result in temporary suspension of services.

The right to restriction of processing of your personal data means that, in certain specific situations, you have the right to request that the processing of your personal data be restricted.

One example of a situation in which you have the right to request restriction of processing is if you believe that data concerning you is inaccurate and you have requested rectification of your data. While the matter is being investigated, you may also request that the processing of the relevant personal data be restricted.

Another situation is if you have objected to a specific processing activity. During the time we access whether our legitimate interest overrides your interest in not having the personal data processed, you may also have the right to request a restriction of processing.

You may also ask Telia to restrict the use of your personal data (instead of erasure) if Telia has processed your data unlawfully, but you do not want the data to be erased, or if Telia no longer needs your data, but you want Telia to retain it for the establishment, exercise or defence of legal claims. However, you should be aware that this right requires a very precise formulation and may, in some cases, result in temporary suspension of services.

You will be informed when a restriction is lifted.

11.8 The right to lodge a complaint

You are always entitled to contact Telia, the Data Protection Agency, or the court to protect your rights and your personal data. The Data Protection Agency is a public institution that can be contacted or consulted on issues related to personal data protection.

If you believe that your personal data is being processed in violation of current regulations, you should report it to Telia as soon as possible by calling our customer service on 90 200. You can also contact Telia's data protection representative (see contact information below).

You can also lodge a complaint with the Swedish Data Protection Agency (see contact information below).

11.9 The right to damages

If you have suffered damage because of personal data being processed in violation of applicable laws or regulations, you may be entitled to damages. Damages claims can be brought forward to Telia or to a court. A damage claim request brought forward to Telia must be made in writing and must contain the following information: full name, social security number and any subscription number.

11.10 How to exercise your rights under GDPR

You can exercise all the above-mentioned rights by contacting Telia and verifying your identity in any convenient manner. Once identified, we will promptly register and process the request. We will provide information on the action taken no later than within one month of receipt of the request.

You can exercise your rights:

- By logging in to www.telia.se or via the MittTelia application,
- On arrival at any Telia store,
- By contacting us by phone at 90 200,
- By contacting us via email at dpo-se (a) teliacompany.com, or
- By writing to:

  Telia Sverige AB
  Mina Rättigheter - Privat
  Svarspost 108317743
  978 00 Luleå

In case we are not able to find a solution together, you have the right to contact and lodge a complaint with Integritetsskyddsmyndigheten (IMY) (www.imy.se), who is responsible for the supervision and control of personal data protection legislation.

Contact information to IMY:

Phone number: +46 (0)8 657 61 00
Email: imy@imy.se
Postal address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden.

Telia is committed to conducting responsible and sustainable business. If suspected that Telia has acted contrary to the legislation or the Privacy policy, this can also be reported confidentially through Telia Company's Speak Up Line (our whistleblowing system).

Our Data Protection Officer can be reached via email at dpo-se (a) teliacompany.com.

Learn more about privacy in Telia Company.

12 Changes to this Privacy policy

Just as modern communications services, devices and solutions are evolving at a fast pace, so are the data processing activities necessary to provide those. We will do our best to keep the Privacy policy up-to-date and available to you on the Telia website www.telia.se. For this reason, we encourage you to periodically visit our website, where you will always find the most current version of this Privacy policy. We may also notify you of the most significant changes that concern you in the Privacy policy on our website, by email or in any other reasonable manner.

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