



Privacy Notice of Telia Eesti AS

The processor of personal data is Telia Eesti AS (Mustamäe tee 3, Tallinn, reg. code: 10234957) (hereinafter 'Telia') and, in some cases, Telia Company AB as the parent company of Telia.

What does the privacy notice entail?

The privacy notice:

- explains what we do to protect and respect the privacy of your personal data;
- explains how we collect, use and protect your personal data;
- helps you understand how your personal data is collected and used and what your rights are regarding your personal data.

When processing your personal data, we comply with Estonian and European Union legislation.

We use this data for the purpose for which we collected the data and to the extent necessary to achieve that purpose. Once the objective has been attained, we delete the personal data.

The privacy notice provides you with information and guidelines for when you use our services, products, applications and e-environments or visit our websites. The privacy statement does not include information concerning the processing of data on the websites of other companies or services provided by them, even if you use those services through Telia's network or services.

You may use our services and e-environments either as a contractual client, solely as a service user on the basis of a contract entered into by someone else, or simply by visiting our e-environments as a user, without having to have signed a contract with us. We are guided by the privacy notice in all of the following cases. If the client of our services allows the user to use services on the basis of a contract between them and Telia, the client must also ensure that the user is familiar with the privacy notice.

We refer to the privacy statement and enable you to read it at the time of conclusion of a contract, as well as when providing a service, product and/or use of an e-environment to you. The privacy notice is a document that conveys information to you and is not part of the contract signed with you or of the General Terms and Conditions of Telia.

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 statement up-to-date and available to you on the Telia website www.telia.ee or via the Telia stores. We will notify you of the most significant changes that concern you in the privacy notice on our website, by email or in any other reasonable manner.

What is personal data and what kind of personal data does Telia process?

Personal data (hereinafter also data) is data that is directly or indirectly linked to you as a private individual. For the sake of clarity, we group your personal data into the following five categories based on their nature and sources. The source of personal data refers to through which channels or through whom the personal data reached Telia.

Basic data

Basic data includes, for example: first name, surname, username, personal identification code, date of birth, number of a personal identification documents (e.g., passport, ID-card) and other related information, age, address, e-mail address, information concerning services subscribed to or products purchased (e.g., the composition of the service, additional services, parameters, service address, equipment used, etc.) and the associated static IP address, domain name or device's serial number, invoicing information (invoice address, reference number, invoicing address, etc.), etc.

Data collection sources: we obtain information from you and through your use of services. We also get some basic data from national registers.

Communication data

Communication data includes details on electronic communications services (e.g., the internet, mobile communications, telephone, television and other communications services) concerning the transmission of communications in a communications network, as well as related invoicing. This data reflects your activities when using communications services in a 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 with a certain duration. Communication data also includes the location of the terminal equipment, the network in which the communication begins or ends, the start, end and duration of the connection. Additionally, communication data includes location data concerning the use of communications services.

Data collection sources: we obtain information through your use of services.

Location data

Location data refers to information about the geographic location of terminal equipment or the place of service provision. For example: location coordinates (GPS).

The data listed above may be associated with you directly or indirectly. Direct association means that the data refers directly to you as one specific natural person. Indirect association means that the data can be associated with you by using additional information or additional processing.

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 data.

Data collection sources: We obtain data through your use of services that require the determination of geographic location.

Message content

Message content refers to any communication between two persons using an electronic communications service, e.g., the content of phone calls and e-mails, SMS and MMS content.

It is important to specify here that when you interact with another person by phone, via email, or, for example, by sending text messages, we do not record or use this content and we will not disclose it to third parties.

If you contact us as a service provider, by using the aforementioned means of communication, for example by calling our customer service line or by sending us an e-mail, we are one of the parties to the communication and therefore have the right to use and store the message content data (e.g., to prove the transaction, improve our customer service, etc.). The same applies to situations in which Telia has initiated communication with you.

Sources of data collection: we obtain data if you provide it to us by contacting us.

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 natural person, health data or data on sex life and sexual orientation of a natural person.

Data collection sources: our objective is not to collect your personal data of special categories, but this kind of data may be disclosed to us by chance, e.g., by email or phone call made in the framework of client relations, if you disclose this data to us.

Non-personal communication data

In the sixth category, we handle non-personal communication data, which needs to be processed in order to provide services and to compile invoicing. For us, non-personalized communication data 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.

Data collection sources: we obtain information through use of services by clients who have not been authenticated by Telia.

How do we collect your personal data?

We offer a wide range of services (e.g., communications services, information society services, other services) that you can use. In addition, we enable the use of different customer service and sales environments online, other internet environments or electronic applications (e.g., TV service environment, service management environment, etc.) (hereinafter 'e-environment'). The composition of personal data collected thereby depends on which specific services or e-environments you are using, what kind of data is needed to provide them, the extent to which data is being transmitted to us for this purpose (e.g., subscription to the service, registration as a user, etc.), and what kind of consent you give us for processing data. When collecting data, we adhere to the principle of collecting as little data as needed, i.e., we only collect data that is necessary for attaining an objective.

We collect personal data in the following ways:

- we receive your data when you order a service or goods, sign up as a client, user of a service or an e-environment, subscribe to a newsletter, send us an information inquiry or complaint, and in other similar situations;
- the data will be generated when you use our services (e.g., communication data will be generated when you use communications services, shopping data will be generated when you make purchases at online stores);
- we also receive personal data on a need-basis from other sources (e.g., from other service providers or public registers such as the population register, business register) if this is necessary for the conclusion, performance or enforcement of a contract or for performance of an obligation arising from legislation. In addition, such data processing may also be based on your consent. More information on consent-based data processing can be found down below.

On what grounds and objectives do we process your personal data?

Any kind of processing of personal data must be justified. We have divided Telia's legal grounds for processing personal data into four groups: performance of a legal obligation, performance of a contract, legitimate interest of Telia and your consent.

Similarly, we have grouped all objectives for processing your personal data based on those four legal grounds. Pursuant to this distribution, different storage terms apply to the grounds and objectives, and you have different rights and opportunities to influence and make choices regarding the processing of your personal data.

Legitimate interest

Legitimate interest means that we want to use personal data first and foremost to improve our services and service provision, for the development of services, products and e-environments, and for the promotion of client communication and business activities, all of which is not strictly necessary for the performance of a contract. This way we can provide our client with services, products, price solutions, servicing, etc. just like clients expect us to do. Additionally, we will be able to compile statistics necessary for making the right business decisions. We also process data on the basis of this ground, if it is necessary for documenting transactions made in the course of a business activity and for other business information exchanges. Based on legitimate interest, we will also process your basic data for the purpose of marketing analysis.

Legitimate interest is, above all, the balance between your and our rights. In modern client relations, it is assumed that the service provider will make the use of the service and servicing as simple and accurate as possible for the client. However, this can be best achieved if we are able to use your personal data to do so. However, we still need additional data processing, e.g., for the best use of the communications network and service channels, for improving and developing our communications network and systems, usage statistics, etc.

This overview concerning the processing of personal data on the basis of legitimate interest is not exhaustive. In the event of reasonable necessity and to a reasonable extent, we may process data on the basis of legitimate interest for other purposes as well, provided it is in compliance with legislation.

Since the need for processing personal data on the basis of legitimate interest does not arise directly from legislation or a contract, but at the same time, there is no need for your prior consent, we have solved this so that you can always contact us and ask for clarification, to submit an objection and refuse data processing for any of the following purposes.

The following are objectives that are linked to using data on the basis of legitimate interest.

Objective	Data categories	Processor categories
General marketing activities	-Basic data	Telemarketing/Marketing
Statistics on malfunctions, sales, consumption, etc. (proactive service)	-Basic data -Communication data	
General profiling of client groups	-Basic data	Telemarketing/Marketing
Fraud prevention	-Basic data	
Network and data security, protection of Telia's property (e.g. video surveillance and login information concerning Telia environments)	-Basic data	

Management of client relationships (management of inquiries, communications, customer service), web-chat with Telia	-Basic data	
Client relationships (dispute resolution)	-Basic data	
Intra-group data exchange	-Basic data	
Telia's product and service development	-Basic data	IT development services for information systems and applications
Telia's network and system development	-Basic data -Communication data	IT development services for information systems and applications, Network construction and maintenance
Telia's network and system testing	-Basic data	IT development services for information systems and applications
Ensuring Telia's revenue collection	-Basic data	

Consent based data processing

First and foremost, we ask for your consent for the use of data of communications services (incl. location data), without which we could provide our services, goods and e-environments, but without which personal service, user experience and convenience, not marketing would be complete or personalized.

We wish to use, with your consent, your communications data to determine your purchasing behaviour and consumer habits and/or to derive, by using profiling methods, your consuming related expectations, preferences and needs in order to:

- make marketing offers and send messages to the you and select the suitable marketing channel to do so;
- determine the your marketing segment, client type and/or profile;
- develop and offer new, personal and/or targeted services, offers and features of the e-environment, or enhance user experience;
- display personal or targeted content, offers and advertisements to you via the Telia customer service, sales or other online environments, apps, TV service environments or other electronic environments (e-environment);
- provide communications data for processing to companies in the Telia group and to authorized processors, who will process this data pursuant to objectives set out by Telia.

Objective	Data categories	Processor categories
Personalized marketing profiling <i>A more detailed explanation of marketing profiling can be found down below</i>	-Basic data	Telemarketing/Marketing
Making automatic decisions that have considerable impact on a person (pricing, enabling of consent based services, etc.)	-Basic data	
Direct marketing (emails, SMS, MMS, etc.)	-Basic data	Telemarketing/Marketing
Marketing analysis based on a client's communication data	-Basic data -Communication data	
Statistics based on a client's communication data	-Basic data -Communication data	IT development services for information systems and applications, Network construction and maintenance
Improving service quality based on a client's communication data	-Basic data -Communication data	IT development services for information systems and applications, Network construction and maintenance

You can always withdraw your consent later via Telia's e-environment or by submitting a new corresponding application in writing or in a format that can be reproduced in writing. Application or withdrawal of consent cannot have retroactive effect. Depending on the technical solution, providing and withdrawing consent in the information system can take up to a day to apply.

Your consent shall be valid until you withdraw it or until all contracts concluded with you expire.

The consent is valid both when you have concluded a contract with Telia as well as when you are using Telia's communications services as a identified user set out in the contract concluded by another person, i.e. if you are a personalised user.

We may use your communication data for marketing purposes, in order to associate this with other data concerning you, which may include consumption and credit information of our other services, goods and e-environments, usage data from e-Environments, incl. activity logs, your communication with Telia, data received from processors or third parties (e.g. data received from Google Analytics, Facebook, information on creditworthiness).

With your consent, we may, for marketing purposes, transmit communication data to third parties in order to send Telia marketing messages to you in their applications, e-environments, social media channels, etc. (e.g. in Google applications, on Facebook).

On the grounds of this consent, we may use the your communication data for marketing purposes in the following extent:

- the usage and location data of communication services, incl. across various types and additional services of communication services, the volume, amount, time, manner and location of a service, (e.g. number of call minutes in a certain direction, volume of used data communication), the user, the equipment used, phone number and numbers of other communication devices, IP address and other identifiers and details;
- communication data of terminal equipment (e.g. digibox, router) for using the communication services;
- data obtained from communication data and other aforementioned data by using profiling methods.

In general, the processing of your data, as a private client and as a user of a business client (e.g., when using services ordered and paid for by your employer), will be conducted according to similar rules. However, it is important to point out here that the choice made by you as a private client for the use of your data for marketing purposes does not extend to conducting marketing analysis concerning the business client in the extent that is necessary for making offers based on the business client's use of devices and services, as the legitimate interest of the business client, as out contractual partner, is to receive offers that comply with their needs.

It is important that such an analysis is not based on a personalized approach, but on the total use of a particular business client and on the analysis of the communications data set. However, the set does not include the part of private invoices, i.e., the communication data that is related to you as a private person. These are services that are often not reimbursed by the employer (m-parking, m-lottery, etc.).

You can refuse such data processing by submitting a corresponding objection to Telia.

Performance of a contract

The processing of personal data in order to perform a contract primarily manifests in allowing a certain result for our services and products and this cannot be achieved by avoiding the processing of personal data. We have identified what type of personal information we need to use for the provision of a service or product in order to ensure the quality level set out in the relevant contract, and are therefore able to keep the processing of personal data to a minimum. This includes the following objectives:

Objective	Data categories	Processor categories
Pre-contractual relations (asking for an offer from Telia)	-Basic data	Credit risk and debt
Automatic decisions (credit rating) <i>More detailed information about automatic decisions and provision of credit rating can be found down below</i>	-Basic data	Credit risk and debt
Management of client's orders	-Basic data	Courier, warehouse and logistics services
Servicing client relationships (concluding contracts, identification of a person, forwarding reminders, etc.)	-Basic data -Communication data	

Supplying or delivering of a product/service to the client	-Basic data	Courier, warehouse and logistics services
Ensuring contractual quality of a service	-Basic data -Communication data	Follow-up service of devices
Management of malfunctions that affect the client's services and other incidents (notification, resolution)	-Basic data	
Invoicing (compiling and submitting invoices, collection of payments)	-Basic data	Sending invoices, Software maintenance or support
Provision of communication service (forwarding communication content)	-Basic data -Communication data	
Ensuring the security of Telia's network and services	-Basic data -Communication data	IT development services for information systems and applications
Detection and elimination of technical errors in Telia services	-Basic data -Communication data	IT development services for information systems and applications
Calculation and management of fees related to the use of Telia services (local and roaming service)	-Basic data -Communication data	
Detecting roaming fraud	-Basic data -Communication data	

Compliance with an obligation arising from legislation

Compliance with the obligations arising from the law stipulates data processing that we are required to conduct, as we as a service provider/merchant are required to do so by law.

If data processing is necessary for the performance of an obligation arising from law, we in Telia cannot decide on the collection and recording of such personal data, nor can you. This includes the following objectives:

Objective	Data categories	Processor categories
Accounting	-Basic data	
Replying to inquiries from public authorities	-Basic data	
Mandatory identification in relation to the m-ID service and to prevent money laundering during provision of a financing service	-Basic data	
Mandatory creditworthiness assessment when granting credit	-Basic data	Credit risk and debt
Ensuring quality of a service required by law	-Basic data -Communication data	
Storing communication data as required by law	-Basic data -Communication data	
Notifying a supervisory authority and person of violations that have occurred	-Basic data -Communication data	
Ensuring the security level of communications network as required by law	-Basic data -Communication data	

What is marketing profiling?

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

The distinction between profiling and other automatic marketing data processing is that profiling will help derive or predict additional data concerning you (see examples down below) which may result in non-compliance with reality.

How do we use marketing profiling?

- General segmentation, creation and assignment of client types or profiles, in which we can analyse clients' demographical data (age, gender), service usage data and other aggregate data by using a number of different (specific for various cases), internationally recognized statistical analysis methods to conduct profile analysis, in order to develop different client segments, types or profiles, and, based on the identification data and probability assessment used in the profile analysis, we can determine the specific client segment, type or profile (e.g. technology savvy client) and use this assessment for different marketing decisions (making an offer to the client, displaying personalized content and advertising in the e-environment, etc.).
- Behaviour and interest assessments on the basis of the Client's journey, in the case of which we can analyse use clients' data related to the use of services, website visit data and other data concerning purchasing behaviour and consumption, as well as various methods of statistical analysis and profile analysis, in order to derive client behaviour patterns, models and client types, and, on the basis of the aforementioned, provide a probability assessment on how interested a specific client would be in ordering and using a specific service, thereby predicting the client's interest rate, etc.
- Location-based offers, in the case of which we can analyse data from clients who used communications services in the area of a specific event etc., and use methods of statistical analysis and profile analysis to decide whether or not to send a marketing offer or message to a specific client.

You have the right to file an objection, at any time, concerning the processing of marketing data that is linked to you, including profile analysis for marketing purposes, by notifying Telia of this.

What kind of automatic decisions concerning you do we make?

Credit rating

In the case of selling goods and providing services under credit conditions, incl. the conclusion of consumer credit contracts, we conduct background research concerning the client, the result of which will be expressed with a credit rating.

Your credit rating is updated regularly, at least twice a month.

When determining a credit rating, we collect:

- relevant information about your payment behaviour and background from the information systems of Telia;
- from public databases (official announcements, information provided by bailiffs and other official registers and publications, such as the business register, population register);
- Database of Creditinfo Eesti AS (the payment disruption register of Creditinfo, by using Creditinfo's scoring of private persons).

The credit rating has four stages: new, satisfactory, positive and negative.

Credit rating results 'new' and 'negative' result in non-receipt of credit and a deposit requirement upon subscription for a service.

The results 'satisfactory' and 'positive' will result in the automatic permission for signing up for a service.

Scoring, i.e. the probability of default, is compiled mostly of data from the Estonian Credit Register (information concerning completed/unfinished payment disruption), information from the Land Register, information on the balance of state fees, information concerning the novelty and activity of the specific person on the credit market, etc.

The higher the score, the higher the credit risk of a private person.

More information about scoring can be found at the [website](#) of Creditinfo Eesti AS.

During manual review, we use additional sources as well (search engines, judicial decisions search, etc.).

Debt management

If the client does not pay the debt, despite the debt notifications sent to them, automatic restriction of communications services will be carried out and you will not be able to use your service in the regular extent.

If it is a mobile or telephone service, only outgoing calls will be restricted and you will continue to be able to receive calls in Estonia.

With respect to the automatic decisions made concerning you, you have the right to request that these decisions are reviewed by an employee of Telia.

Are there third parties, in addition to Telia, who can process your personal data?

Companies of the Telia Group can access your data in order to make company management and administrative decisions. They can also do so when using group-based information systems for the provision of services.

We have partners working for us, who will process your data on behalf of Telia. These third parties may not use personal data for purposes other than the provision of the service agreed upon with us. When using our cooperation partners, we take appropriate care to ensure that they act in accordance with this privacy notice.

The companies we work with are usually located in Estonia, the European Union or the European Economic Area, but in individual cases, they may also be located outside those areas. In the latter case, we will take appropriate measures to ensure that your right to protection of personal data is still ensured. You can obtain more detailed information about your data transfer by submitting a data access inquiry.

Pursuant to data processing contracts concluded with partners, co-liability may apply in some cases, which means that both we and our partner carry shared liability for the processing of your personal data. In this case, our partner's data protection terms and conditions apply in addition to our data protection terms and conditions.

Please see our list of approved contractual partners (processors) [here](#).

Other telecommunications network operators or service providers who provide services or are employed to provide you with services, such as invoicing or troubleshooting and eliminating errors.

When you leave our communications network and use mobile roaming services in other operators' networks (e.g., on a trip abroad), these operators can collect and process your personal data and also receive data from Telia. Such processing and collection of data is subject to the terms and conditions of the third-party operator, not this privacy notice. We encourage you to get acquainted with personal data protection practices of other operators.

We can also provide information about you to the competent state authorities (e.g., security and surveillance authorities, including the police, court, emergency centre (112)) if the corresponding obligation arises from legislation. We do this only in the cases set out in legislation and in accordance with the strictly defined processes.

We may also forward your payment disruption details to the publishers of payment disruption according to the rules provided by law.

We may also process anonymous or aggregate data that is not associated with you as an individual. Such data is no longer personal data and may be shared for other purposes and with third parties.

For how long do we store your personal data?

We will store your personal data for the period required to attain the objectives stated in the privacy statement, or until the legal obligation stipulates that we do so.

It should be taken into account here that in certain cases, exceptions apply to maturities, for example, some automatic maturities do not apply in case of debts. Neither do these rules apply to the storing of anonymous data, as in that case, we are no longer dealing with personal data.

The following is a summary table with examples of our principles on storing personal data. This is not a complete list and more precise storage terms can be accessed when reviewing your personal data (see below):

A storage term after which the personalized data that we hold will be erased or anonymized on the assumption that no identifiable features remain (in some cases that can be debt that is due)	Examples
Immediately after processing the data	-Once the message content has been sent

Within 1 month at the latest	-Video surveillance -Multi SMS
After 6 months	-Potential clients who have wanted price offers or information on technical readiness, but have not signed up as clients
After 1 year	-Communication data
After 1.5 years	-Events linked to a client (consultation, general offers)
After 2 years	-Call recordings
After 3 years	-Data of contact persons -Events (order, complaint, incident, debt notice) -Data on claims sold to a collection agency -Data related to granting credit and servicing credit <i>Maturity applies after the contract has been terminated.</i>
After 5 years	-Data collected for the purpose of preventing money laundering and terrorist funding <i>Maturity applies after the contract has been terminated.</i>
After 7 years	-Financial data of an inactive client -Terminated products -Accounting data (incl. contracts from their termination)
After 10 years	-Personal data related to signing up for and terminating Mobile-ID
After 13 years	-Debt data if there is no ongoing recovery procedure
Unspecified terms	-The occurrence of a person's direct identification -Valid authorised contact person and linked contact person

How do we ensure secure processing of your data?

We implement the necessary organisational and info-technological security measures to ensure the integrity, availability and confidentiality of the data. These measures include the protection of employees, information, IT infrastructure, corporate 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. If necessary, we will specify, on our website, the specific measures that we can use to ensure the security of the communication network.

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.

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.

What can you do to protect your personal data?

Even though we at Telia put a lot of emphasis on keeping your personal data safe and secure, you yourself also have an important role in ensuring the success of those aims.

Prior to disclosing your personal data to third parties or entering it somewhere, consider who will receive the data and how securely it will be stored.

Disclosing passwords, ID-card data and other sensitive information and tools and sharing those with others is neither a permissible step nor a reasonable decision. In the case of communication and internet services, it must be taken into account 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 notice or that your information has been disclosed to strangers, be sure to inform us as soon as possible. This way we can solve the situations as quickly as possible and help minimize potential losses.

You can always check and change your data and access to it on our self-service environment.

What are your rights in relation to your personal data?

The right of access to your data

You have the right to access your personal data that Telia has at any time. Additionally, you have the right to be informed of the objectives of data processing and the storage terms of the data. Access to the data is possible through the self-service environment and at Telia stores. To do this, you need to properly authenticate yourself in advance and submit a corresponding application to us. We have the right to reply to such inquiries within 30 days. You can read more about this topic [here](#).

The right to amend personal data

If you have discovered incorrect data when reviewing your data or if your personal data has changed, you can always change it by yourself at our self-service or by turning to the nearest Telia store.

The right to be forgotten

In certain cases, you have the right to have your personal data deleted. This applies especially to the processing of data on the grounds of consent and legitimate interest. This includes, for example, marketing profiles and the like. However, the complete deletion of personal data is often not possible, as we use data for other purposes as well, in relation to which the early deletion of such data is not allowed due to contractual or legal reasons.

The right to submit objections

You have the right to object, at any time, to any activity regarding the processing of your personal data that is conducted on the grounds of legitimate interest. When submitting an objection, we will consider legitimate interests and, if possible, will stop processing the relevant data.

This right cannot be used in a situation where we are required to compile, submit or defend a legal claim (e.g., we believe that a person has breached the contract and therefore have to turn to a court or other law enforcement agency to protect our rights).

The right to restrict the processing of your personal data

In certain cases, you have the option of restricting the processing of personal data by explicitly informing us through our self-service or by turning to a Telia store. This right can only be exercised in the following cases:

- to verify the accuracy of personal data when you have challenged their accuracy;
- to record illegal data processing;
- you need personal data for compiling, submitting or defending a legal claim;
- when you file an objection to consider the legitimate interest and you wish to limit the processing of the data in question until a decision has been made.

However, you should take into account that this right requires a very precise formulation of the objective and may, in some cases, result in temporary suspension of services.

The right to transfer data

The right to transfer data gives you additional control over your personal data. We enable you to access your personal data or have it transferred directly to another service provider, in a machine-readable format (provided that the other service provider has the capacity of receive the data in such format). Please note that we cannot guarantee this and are not responsible for the capacity of another service provider to receive your personal data.

Unlike the right to access your data, your right to transfer data is limited by a number of features:

- you have the right to receive personal data that you have submitted to us in a structured, commonly used and machine-readable format;
- the right to transfer applies only to the data that we use for the performance of the contract or on the basis of consent, and only by automated means;
- when exercising this right, we must also take into account the privacy rights of third parties.

In order to provide more convenient service to you, we have solved the exercising of this right in the same way as the access to personal data on the self-service.

The right to turn to Telia or a supervisory authority and a court

If you would like to receive additional information about the use of your personal data or assistance with exercising your rights on the self-service, you can always contact our customer service at 639 7130 or at info@telia.ee.

If you are concerned that your personal data has been handled with negligence or contrary to the content of the privacy notice, you can always notify our personal data protection expert at privacy@telia.ee.

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

On using cookies in our e-environments

Similarly to other websites, Telia's websites and e-environments use the technology of cookies. The use of cookies is linked to all of the four aforementioned legal grounds mentioned, that is, we need cookies due to legal obligations, to ensure the quality of service set out in the contract, to provide more personalized and convenient services, as well as for marketing purposes with consent from you.

Cookies are small text files uploaded to the user's computer via the e-environment's server. As a result, the web browser can send information of the cookie back to the e-environment during every new visit to the e-environment, in order to recognise the user.

Cookies may be disabled in your browser settings, if you have selected this option. Keep in mind that in some cases it may slow down the browsing of a website, reduce the functionality of certain websites or prevent access to them.

As a rule, we use data collected with cookies for the following purposes:

Functional cookies and provision of services: Cookies are very important for the functioning of our website and electronic services and allow us to streamline user experience. For example, if the user wants, they do not have to enter their username, password and personalization options every time they log into our service.

Development of services: By tracking cookies, we can improve the functioning of our e-environment and electronic services. For example, we can get information on what are the most popular parts of our website, which websites our users will pass by, from which websites they come from and how much time they spend at our e-environment.

Usage analysis: We use cookies to compile statistics on the number of visitors to our e-environments and online services, and we also evaluate the effectiveness of advertisements.

Directing marketing: By using cookies, we can also collect information about the displaying of advertisement or specific browser-targeted content by creating different target groups.

We may combine the information obtained with cookies with information about you in other ways, e.g., with information about services used.

Our websites may have links to third-party websites, products and services, as well as social media extensions (e.g., Facebook plugins, Google Analytics) for marketing and statistics purposes. Third-party services or third-party applications on our websites are subject to the privacy protection rules of third parties. We recommend that you acquaint yourself with the personal data protection practices of data concerning such persons.

It is also recommended that you read the [Privacy Policy](#) of the clients of the Telia Company.