

PRIVACY NOTICE OF TELIA EESTI AS



Telia Eesti AS (Mustamäe tee 3, Tallinn, registry code: 10234957) (hereinafter 'Telia' or 'we', 'us' or 'our') is the Controller of your personal data and here's how we process and protect it.

Telia recognizes that the protection of personal data is extremely important to our customers and other individuals whose personal data we are processing. Therefore, we protect the privacy of every data subject with the utmost responsibility and care. When processing personal data, Telia complies with the General Data Protection Regulation (EU 2016/679), the Electronic Communications Act, and other applicable legislation.

We refer to the Privacy Notice and allow you to read it when entering into a contract, and the same applies when we provide you with services, goods and/or e-environments. The Privacy Notice is an informative document and not part of the contract entered into or the General Terms and Conditions of Telia.

1. What is in this Privacy Notice?

This Privacy Notice applies to the processing of personal data of natural persons. In addition to this Privacy Notice, Telia may have service-specific privacy notices that describe the processing of personal data in connection with a particular service. For example, the [Smart WiFi Privacy Notice](#). You can find these documents on our website: <https://www.telia.ee/lepingud-ja-tingimused/>.

This Privacy Notice explains the following:

- how and what personal data we collect and process;
- for what purposes and on what legal grounds we process your personal data;
- for how long we store your personal data;
- who are authorised to process your personal data in addition to Telia;
- how we protect your personal data;
- what rights you have regarding the processing of your personal data and how to exercise your rights.

What is not covered in this notice?

This Privacy Notice does not apply to the processing of your personal data by other companies when you are using their services or websites. Even if they were accessed through Telia's communications network or services. All companies that process personal data should have their own privacy and cookie notices. It should be remembered that the processing of personal data carried out by these other companies follows the rules established by them.

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

Personal data (hereinafter also the 'data') is data directly or indirectly related to you as a natural person. For the sake of clarity, we group personal data into the following categories.

Basic personal data

Basic personal data is all personal data which relates to an identified or unidentifiable natural person, but which does not fall under any other data category. Telia processes your personal data, including for example: personal identification data (e.g. name, personal identification code, date of birth); contact information (e.g. address, email address); data on ordering, offering, and delivering of products and services, as well as the related contracts and their changes; data on payments, solvency, and debts; your communication with Telia, etc.

Basic personal data	
Personal identification information	Given name and surname, username, personal identification code, date of birth, number of identity document (e.g. passport, ID card), Mobile-ID and Smart-ID PIN 1, and password.
Contact details	Phone number, email address, address, preferred contact channel, and changes made to the contact details.
Data related to products and services	Service installation address, customer ID number, payment plans, used services, service/product start/end date, duration, status, equipment used, and details related to the services. Mobile or landline phone number, SIM card number; IP address, domain; phone model, IMEI, international mobile subscriber identity (IMSI), PIN and PUK codes,

	MAC address, service history of the mobile phone, changes made to products and services, fault tickets, and activity logs (time stamps, if necessary).
Information related to payments, evaluation of solvency and debts	Bank account number, requisite information, VAT number, billing details (invoice date, due date, number, etc.), payment data (payment ID, amount, date), invoice submission method (email, SMS, regular mail, etc.), payment method, information about direct debit agreement, information about debts, status of debts to third parties, other data necessary for assessing creditworthiness.
Your consents/objections	Information about your consents, their changes and withdrawal; activity logs (time stamps, if necessary), objections to the processing of personal data, etc.
Profiles related to you	Profiles (data created by Telia as part of data processing) to classify users according to various characteristics (using profiling, if necessary).
Images, videos, and security camera recordings	Data captured by video cameras and images if you visit a Telia shop, for example (images captured using a video surveillance system are personal data only if the person can be identified there). Photos (snapshots) of a device (not an individual) taken from the video between a customer and Telia if the customer uses a visual support solution (e.g. TechSee).
Your communication with Telia	Recordings of conversations (calls, chatbots) with the customer support and their content, activity logs (time stamps, if necessary), duration, phone number of the customer. Emails related to your communication with Telia and their content.
Data about trustworthiness and due diligence	Data about payment behaviour, debts, damage caused; data allowing Telia to comply with the due diligence measures taken to prevent money laundering and terrorist financing and ensure compliance with international sanctions.
Other information	Age, gender, language preferences, other set preferences, number of family members to identify several users (the users of a single service, i.e. Mobile Life, for example).

* These are key examples of data processed; the list is not exhaustive.

Traffic data

Traffic data is being generated using communications services (e.g. Internet, mobile, phone, and other traffic services) Telia is providing and are 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. Traffic data also includes the location of the terminal equipment, the network in which the communication begins or ends, as well as the start, end, and duration of the connection. Traffic data also includes location data on the use of communications services.

Traffic data*	
Fixed/mobile network call data	Calls: number of the caller; number of the recipient; the date and time of the start and end of the call; duration; information about forwarding the call; International Mobile Equipment Identity (IMEI) of the caller (mobile phone); cell ID at the start of the call; location data.
SMS, MMS, and voicemail services	Number of the SMS/MMS sender and recipient; date of sending and receiving, time, sending tags (indication whether the message was sent or not), time of the call to the voicemail (when the message reached the voicemail); event information (whether the message reached the voicemail successfully), location data (wider areas around antennas/masts, city, country).
Internet service (fixed and mobile network)	User login ID name, phone number; data used to identify the date, time, and duration of the Internet session, IP address provided by the Internet service provider used during the connection, target IP address of the IP packet transmitted over the Internet, website visited (i.e. URL, DNS, website IP address), data volume, location data (wider areas around antennas/masts, city, country).

* These are key examples of data processed; the list is not exhaustive.

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). In addition to traffic data, it may be necessary to also process

location data in order to offer and provide value-added services. Location data does not include address of residence, service provision or billing, contact address, etc. Such data is part of the basic personal data. When location data derived from communications network is used for the purpose of the conveyance of communication on an electronic communications network or billing thereof, such location data is not included in this data type, but it is traffic data.

Content of communication

Content of communication refers to information exchanged (communication) between two communicating parties using an electronic communications service, e.g., the content of phone calls and e-mails, SMS and MMS content. It is important to specify that when you interact with another communication party by phone call, via email, or, for example, by sending text messages (SMS), we do not record or use this content.

Your communication with Telia

If you contact us as a service provider by using the abovementioned means of communication, for example, by calling to our customer service or sending us an email or contacting us via web chat, we are one party of the communication. Therefore, we may need or want to record such communication (for example, your communication with the customer service in order to prove that we have a contract with you, you have ordered a service from us; or to improve our customer service, etc.). The same applies to a situation where Telia has started communication with you.

Special categories of personal data

Special categories of personal data include the following: racial or ethnic origin, political views, religious or philosophical beliefs or trade union membership, genetic data, biometric data used as a unique identifier for a natural person, health data or data about sexual 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.

Children's personal data

Telia processes children's personal data to the extent permitted by law, if necessary or required. Telia makes reasonable efforts to ensure and verify that the legal representative of a child under the age of 13 has consented to the processing of the child's personal data, taking into account the available technology and privacy risks related to the processing.

Non-personal traffic data

In certain cases, non-personal traffic data should also be processed in order to provide services and prepare invoices. We consider non-personal traffic data to be traffic data obtained from the use of communications services in our network by roaming service customers, customers of other operators or Internet service providers.

Anonymous data

We also process anonymous or aggregated data that is not related to you as an individual. We make sure that the anonymisation process is secure and the outcome completely anonymous. Anonymous data is no longer personal data within the meaning of the General Data Protection Regulation and, therefore, it does not have to be subject to data protection principles.

3. When and how do we collect your personal data?

Telia offers a wide range of products and services (e.g. communications services, information society services, IT services, etc.). We also provide the use of various online customer service and sales environments, electronic applications (e.g. TV service environment), and other environments (hereinafter also the 'e-environment'). Therefore, the information we collect about you depends on the specific services, products or e-environments you use; what data needs to be processed in order to provide them; the extent to which you provide us with your data (e.g. when ordering and using the service, registering as a user, etc.); and what consents you give us to process your data. When collecting the data, we adhere to de minimis grounds, meaning that we only collect data necessary to achieve the purpose.

We receive (collect) your personal data mainly in the following ways:

- data **you provide** us, for example, when you communicate or have a contractual relationship with our company, i.e. you purchase our products, services or register as a user of services, subscribe to our newsletter, respond to our customer satisfaction survey, contact us for information, etc.;
- data **generated when you use our communications networks, services, and environments**, i.e. you call someone, send messages (SMS), browse the Internet, use TV and entertainment services, visit our websites, etc.;
- **derived data** that we have created based on your personal information, such as user profiles, analytical data and conclusions based on automated analytical decisions about your possible preferences and interests;
- data that is **available from other sources**, such as other service providers, publicly available registers, state agencies (e.g. population register), banks, creditors (for credit checks and solvency assessments), etc.

4. On what legal grounds and for what purposes do we process your personal data?

Any kind of processing of personal data must be justified. Therefore, we collect and process your personal data to the extent necessary for specific purposes and for as long as it is necessary to fulfil such specified purposes.

Telia processes your personal data according to four legal grounds (legal obligation, performance of the contract, legitimate interest and consent) that are described below. In this Privacy Notice we have grouped purposes of processing of your personal data based on those four legal grounds. The abovementioned legal grounds are subject to different retention periods for personal data and you have different rights and options to influence the processing of your data and make choices. More detailed information is provided below.

We may also process anonymous or aggregated data that is not associated to you as an individual. Such data is no longer personal data within the meaning of the General Data Protection Regulation and, therefore, it does not have to be subject to data protection principles.

Data processing on the basis of a legitimate interest

Legitimate interest means that we want to use your personal data first and foremost to improve our services and for the promotion of customer communication and business activities. All of this, however, is not strictly necessary for the performance of a contract. Additionally, we can use such data to create the statistics that is necessary to make better business decisions and marketing analyses. This way we can provide our customers with services, products, price solutions, service, etc. that meet their expectations.

Legitimate interest is, above all, the balance between your and our rights. In modern customer relations, it is assumed that the service provider makes the use of the service, as well as the service provision as simple and convenient as possible for the customer. This can be best achieved by also using your personal data. However, additional data processing is also needed for the best use of the communication network and service channels and for risk management (to assess the risks and overall reliability of the customer or their representative). Furthermore, it is needed to improve and develop our communication networks and systems, service channels, usage statistics, etc.

Telia strives to live up to your expectations every way to ensure high quality services, smooth provision of products and services, and the best customer service. Therefore, Telia has a legitimate interest in the processing of your personal data for the purposes provided below.

Data processing purpose	Data category
Direct marketing when consent is not required (e.g. by phone).	Basic personal data
General marketing activities related to the provision of products and services (based on data from our systems and do not include extensive profiling).	Basic personal data
Processing for statistical and analytical purposes to identify general trends and correlations (i.e. not to make recommendations targeted at individuals).	Basic personal data
General profiling of customer groups. This means that we create a general profile of you to better understand you as a customer and tailor the services and content accordingly. <i>For a more detailed explanation of marketing profiling, please see the clause 4.1.</i>	Basic personal data
Fraud prevention and risk management.	Basic personal data
Network and information security, cyber security, data protection. Protection of the information systems and assets of Telia (e.g. video surveillance, login information of Telia's environments).	Basic personal data

Data processing required for the purpose of maintaining and developing relations with the customers. Management of customer relations (processing of queries, communication, customer service), webchat and calls with Telia. Data processing required for the purpose of customer service.	Basic personal data
Data exchange and/or data transmission within Telia Group.	Basic personal data
Service and product improvement.	Basic personal data
Development and maintenance of systems and networks. Assurance and improvement of service quality.	Basic personal data Traffic data
Processing of traffic data for statistical and analytical purposes. Statistics on failures, sales, consumption, etc. (proactive operation).	Basic personal data Traffic data
Processing of personal data essential for testing systems and networks.	Basic personal data Traffic data
Processing necessary for revenue assurance.	Basic personal data
Speak-up-line – reporting of suspected violations of laws and regulations or corporate policies.	Basic personal data
Processing of personal data required for communication with suppliers and partners.	Basic personal data
Processing of personal data required for dispute settlement.	Basic personal data

As the need to process personal data on the basis of a legitimate interest does not arise directly from legislation or 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 explanations and submit an objection to the waiving of data processing for any of the above purposes. Processing for marketing purposes on the basis of a legitimate interest can always be disputed, if requested. After we have received your objection to the processing for marketing purposes, we will immediately apply the changes to stop it. The implementation of these changes (termination of data processing) may take some time (depending on the extent and complexity of the changes to be implemented). For more detailed information and to submit an application/query, click [here](#).

Data processing based on consent

We ask for your consent for the use of communications service data (including location data) without which we still can offer our services, goods, and e-environments, but we cannot personalise the service, user experience and marketing. Consent is also required for direct marketing taking place via electronic communication channels (e.g. email, SMS).

When we ask for your consent, we will provide you with detailed information about the purposes of processing on the basis of consent and how you can withdraw your consent at any time. With your consent, Telia may process your personal data (including traffic data) for the purposes described below.

Data processing purpose	Data category
Direct marketing offers and notifications via email, SMS or other e-channels (direct marketing).	Basic personal data
Automatic decision-making that has a significant impact on a person (provision of consent-based services, pricing, etc.).	Basic personal data
Processing of traffic data (including personal profiling) for marketing purposes to receive more personalised service, offers, and services. <i>For a more detailed explanation of marketing profiling, please see the clause 4.1.</i>	Basic personal data Traffic data
Processing of location data on the use of communications services for the purpose of analysis and development to improve the quality of the communication network.	Basic personal data Traffic data
Processing of special categories of personal data. For example, when testing the user experience of a specific target group.	Special categories of personal data

You can give and withdraw your consent at any time via the e-environment of Telia or using other channels by sending an application in writing or in a format that can be reproduced in writing. There is no retroactive effect to applying for or withdrawing consent. Depending on the technical solution, providing and withdrawing consent in the information system can take up to a day to apply.

Your consent is valid until you withdraw it or until all contracts concluded with you expire. The consent is valid both when you have entered into a contract with Telia and if you use the communications services of Telia as an identified user in a contract entered into with another person.

In general, processing of your data, as a private customer and as a user of a business customer (e.g. when using paid services ordered by the employer), the same principles apply. It is important to highlight that your choice made as a private customer to process data for marketing purposes does not extend to marketing data processing concerning a business customer. This to the extent necessary to make offers based on the use of the business customer's equipment and services. This is due to the fact that the business customer as our contractual partner has a legitimate interest in receiving offers that meet their needs.

Please note that such data processing is not based on a personalised approach, but on the total use of services of a business customer. The corresponding analysis does not include the private billing part, i.e. traffic data related to you as an individual. These are services that are often not reimbursed by the employer (e.g. m-parking, m-lottery, etc.). You can refuse such data processing by submitting a corresponding objection to Telia.

Data processing for the performance of the contract

The processing of personal data for the performance of the contract is necessary for Telia to perform the contract entered into with you or to perform the necessary activities before entering a contract with you. This includes the following processing purposes:

Data processing purpose	Data category
Pre-contractual relations. Processing of personal data required for preparing a contractual offer at the request of a person and/or providing pre-contractual information.	Basic personal data
Automated decision making when necessary to enter into or perform a contract. <i>For more detailed information about automated decisions and credit ratings, see clause 5.</i>	Basic personal data
Order management. Processing of personal data required for issuing, processing, and completing customer orders.	Basic personal data
Customer management. Processing of personal data required for customer communication (entering into contracts, forwarding reminders, etc.).	Basic personal data
Processing of personal data required for delivering products and services.	Basic personal data
Assurance of product and service quality. Processing of personal data required for monitoring, managing, and reporting quality of service according to the contract with the customer.	Basic personal data
Management of failures and other incidents affecting the customer's services (including resolution of incidents and issues related to the performance of the contract; notification). Processing required for detecting technical failures and/or errors in the transmission of electronic communications.	Basic personal data Traffic data
Billing and payment. Processing of personal data required for issuing invoices, calculating fees (local and roaming services), and receiving payments.	Basic personal data Traffic data
Processing required for providing communications service (transmission of communication content).	Basic personal data Traffic data
Processing required for maintaining and restoring the security of electronic communications networks and services.	Basic personal data Traffic data
Processing of traffic data required for detecting or stopping fraud, abuse or misuse of electronic communications services.	Basic personal data Traffic data
Testing based on testing agreements with voluntary users.	Basic personal data Traffic data

Data processing for the fulfilment of a legal obligation

The fulfilment of obligations arising from the law includes such processing of data that we are obligated to carry out, as we are required to do so by law. If the processing of data is required for fulfilling a legal obligation, we at Telia cannot decide on the processing of such personal data, and neither can you. On this legal basis, we process your personal data for the purposes below.

Data processing purpose	Data category
Accounting to comply with the accounting obligation arising from law.	Basic personal data

Mandatory personal identification. For example, in connection with the mobile-ID service, as well as the prevention of money laundering, the provision of financial services or to ensure compliance with international sanctions.	Basic personal data
Mandatory assessment of customer's creditworthiness required by law.	Basic personal data
Adherence to the 'Know Your Customer' principles. Data processing in connection with the prevention of money laundering and terrorist financing and the enforcement of international sanctions in the provision of financial services.	Basic personal data
Responding to queries from state agencies in cases specified by law. Responding to queries from a data subject in connection with the exercise of their rights.	Basic personal data
Processing of traffic data required for complying with the service quality requirements provided by law.	Basic personal data Traffic data
Retention of traffic data as required by law.	Basic personal data Traffic data
Mandatory notification of authorities and individuals required by law. Notification of a supervisory authority and person of violations that have occurred.	Basic personal data Traffic data
Providing data to court and to other law enforcement and/or state agencies according to law. Corresponding queries, logs, and court rulings.	Basic personal data Traffic data
Assurance of the security and privacy of the communications network required by law.	Basic personal data Traffic data
Number portability. Processing of data required for fulfilling the number portability obligation.	Basic personal data Traffic data

4.1 What is marketing profiling?

Profiling for marketing purposes means such processing where we process your data by means of data processing technologies, using various statistical or mathematical analysis or prediction methods. This is to establish/detect different relations, probabilities, correlations, patterns, models, marketing profiles, etc. The above allows us to predict or derive customer' expectations, preferences, and needs in connection to the consumption of the goods and services we offer.

Profiling differs from other marketing automated data processing in that it derives or predicts additional data about a person (see examples below) and may contain inconsistencies with reality, or the possibility of error. Profiling always involves some possibility of error, as relations are established on the mathematical and statistical bases. If there is no possibility of error in assigning an individual to a particular category, this indicates that the processing in question is not profiling under the General Data Protection Regulation.

How do we use marketing profiling at Telia?

- By creating and assigning customer types or profiles, in which we can analyse customer' demographic data (age, gender), service usage data and other aggregated data, using various (case-based) internationally recognised statistical analysis methods. Based on the identification data and probability assessment used in the profile analysis, we can determine a specific customer segment, type or profile (e.g. technology savvy customer) and use this assessment for different marketing decisions (e.g. displaying personalised content, making offers, personalised content, and displaying ads in the e-environments, etc.).
- Based on the customer's journey, we can predict customer behaviour and interest. In this case, we can analyse customer data related to the use of services, website visits, and other data related to purchasing behaviour and consumption. We also use various methods of statistical and profile analysis to derive customer behaviour patterns, models, and customer types. As a result, we obtain a probability assessment, for example, on how interested the customer would be in ordering and using a particular service, i.e. the so-called predicting the customer's interest, etc.
- Location-based offers – in this case, we can analyse the data of customers who used communications services in the area of a specific event, etc. and use methods of statistical analysing and profile analysis to decide whether to send a marketing offer or message to a specific customer or not.

You have the right to object at any time to the processing of data related to you for marketing purposes, including marketing profiling, by notifying Telia via the e-environment or by submitting a request in writing or in a format that can be reproduced in writing.

5. What automated decisions are made about you at Telia?

Credit rating and credit limit

In case of selling goods and providing services under credit conditions, incl. the conclusion of consumer credit contracts, Telia conducts background research concerning the customer and assesses the creditworthiness of the customer. The results of such are expressed in the customer's credit rating and/or in the calculated credit limit which is necessary for the use of different payment methods and services, as well as, contractual services (hereinafter Credit Terms).

Credit limit

Credit limits are indicative financial limits applicable to the customer, in excess of which Telia is not obligated to provide the customer Telia contractual services for credit. The final amount and conditions of the credit offered to the customer will become clear after the submission of the respective application by the customer and after having assessed the customer's creditworthiness.

Credit rating

A credit rating is an assessment of the probability of insolvency of a private customer based on the relevant customer's payment behaviour, background information obtained from Telia's internal information systems and Creditinfo. Creditinfo's external risk assessments are risk parameters calculated on the basis of data available from public sources for the assessment of credit risk related to a private person. Different information is used to calculate the credit rating; this includes information from the Creditinfo credit register, the business activity of the specific individual, as well as the experience and activity of the private person in the credit market. The higher the score obtained, the higher the credit risk associated with that private person. More information about this can be found on the [website](#) of Creditinfo Eesti AS.

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 if the customer has no current debt.

While determining credit terms, we collect relevant information about the customer's payment behaviour and background:

- from Telia's information systems (e.g. length of the customer relationship, payment behaviour in relation to Telia: data on debts and payment of invoices), incl. companies related to the customer;
- from public databases (official announcements, information provided by enforcement agents and other official registers, such as the business register, population register);
- from the database and external credit risk assessments of Creditinfo Eesti AS (Credit Register of Creditinfo: the dates of occurrence and termination of the default of both the customer and the companies related to the customer; debt amounts and the sector of origin of the debt; Creditinfo's private scores and credit assessments of customer -related companies);
- from other reliable sources (e.g. background information from private registries for compliance with due diligence requirements pursuant to money-laundering regulations, court decisions, etc.), if necessary.

Debt management

If the customer does not pay the debt despite the debt notifications, the communications services will be automatically restricted and the customer will not be able to use the service to the normal extent. If it is a mobile or telephone service, only outgoing calls will be restricted, and the customer will be able to continue to receive calls in Estonia.

In order to ensure a reliable economic environment, Telia has the right to forward information about the debts to the Credit Register of Creditinfo or another reliable company processing debts.

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

6. For how long do we store your personal data?

We will retain your personal data for the time necessary to achieve the purposes established in this Privacy Notice or until an obligation imposed by law states it should be retained. It should be noted that in certain cases there are exceptions to the normal retention times. For example, some automatic terms of erasure do not apply in case of debts and disputes. Furthermore, the retention of anonymous data is not subject to these rules, as in this case, it is no longer personal data.

Telia takes the necessary measures to ensure that outdated data is erased or made anonymous. The following table summarises our retention principles for personal data. This is not an exhaustive list and more detailed retention periods can be viewed by submitting an application to Telia (see clause 9 below).

Retention period	Examples
<i>Retention period after which personal data in our possession is erased or made anonymous, provided that there are no exceptional circumstances (e.g. possible debts).</i>	
Immediately after processing the data	Content of communication upon transmission of communication.
Within 1 month, at the latest	Video surveillance; Multi-SMS.
After 3 months	Photos (snapshots) of a device (not an individual) taken from the video between a customer and Telia if the customer uses a visual support solution (e.g. when using the TechSee application).
After 6 months	Potential customers to whom we have made price offers or provided information on technical readiness, but who are not yet our contractual customer.
After 1 year	Traffic data.
After 1.5 years	Events linked to a customer (consultation, general offers).
After 2 years	Your communication with Telia – voice recordings, emails, recordings of chatbots, etc. Repair and maintenance agreements.
After 3 years <i>The term of erasure applies after the contract has been terminated.</i>	Details of the contact persons. Events (order, complaint, incident). Data on claims sold to a collection agency. Data related to granting credit and servicing credit.
After 5 years <i>The term of erasure applies after the contract has been terminated.</i>	Data collected for the purpose of preventing money laundering and terrorist funding.
After 7 years <i>The term of erasure with regard to the contract applies after the contract has been terminated.</i>	Financial data of an inactive customer. Terminated products. Accounting data (including contracts and related documents).
10 years after the certificate has expired	Personal data related to Mobile-ID subscription and termination.
After 15 years	Details of outstanding debt in the absence of an ongoing recovery procedure.
Unspecified terms	The fact of direct identification. Valid authorised contact person and linked contact person.

7. Are there other parties, in addition to Telia, who may process your personal data?

We have the right to disclose your personal data to the extent permitted and/or required by law and in compliance with the requirements of the laws governing the protection of personal data. This is only in duly justified cases and only to those recipients of data who undertake to protect them properly. Below are various examples of parties who may process your personal data in addition to Telia.

- **The companies of Telia Company group** have the right to process your data to the extent permitted by law for the purposes established in this Privacy Notice and for making corporate management and business decisions.
- **Our partners and suppliers** also process your data on behalf of Telia. These partners may process personal data only in accordance with Telia's instructions and to the extent necessary to fulfil the obligations arising from the contract concluded between them and Telia. When using our partners, we take appropriate care to

ensure that they act in accordance with this Privacy Notice. The processors referred to herein include, for example, IT service providers, equipment servicing partners, and marketing agencies performing marketing efforts on our behalf. These third parties may not use personal data for purposes other than the provision of the service agreed upon with us.

Our partner companies 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 also take appropriate measures to ensure that your right to protection of personal data is still ensured. For more information on the transfer of your data, please contact us to submit a query to view the data. According to the data processing contracts entered into with partners, joint liability may also apply in certain cases, which means that both Telia and our partner are responsible 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 the list of contractual partners (processors) [here](#). This list includes our processors, as well as the partners with whom we have joint liability as processors.

- **Other telecommunication network operators or service providers** that provide or work to provide services to you, such as invoicing and the prevention and rectification of failures or errors.

For example, if you subscribe to a service through us, it may be necessary to transfer your data to that service provider in order to provide it. If you send your device to us for maintenance, the warranty conditions may require that your data be passed on to the device manufacturer.

Your data may also be transferred in connection with electronic identification or electronic signature to the identification service provider or service providers whose services you have access to or whose services you can access by logging in using electronic identification (e.g. mobile-ID, Smart-ID, etc.). We may transfer personal data to service providers to the extent required for the purpose intended for the services or in accordance with the law.

If you pay for purchases or services by adding the corresponding amount to your telephone invoice (m-payments, calling service numbers), Telia may process the personal data required for such a payment transaction and disclose the phone number to the service provider from whom you purchase the service.

If you use mobile roaming on other operators' networks (e.g. when travelling abroad), these operators can collect and process your personal data, as well as receive data from Telia. When Telia transfers personal data to other telecommunications companies or service providers, the processing and collection of personal data takes place in accordance with the terms and conditions and privacy policies of the respective telecommunications company or service provider. We recommend that you contact the relevant telecommunications company or service provider if you need more information about their privacy policies.

- In cases provided by law, we may also provide information about you to **state agencies** (e.g. security and surveillance agencies, including the police, prosecutors, courts, the Emergency Response Centre (112), etc.). We do this only in the cases set out in legislation and in accordance with the strictly defined processes. We may also provide information to other state agencies if it involves a legal obligation and purpose.
- **Other third parties with your consent** we may have obtained in connection with a specific service or purpose.
- **Company that maintains a public directory of directory numbers or provides a directory inquiry service** if you have given your consent.
- **Companies engaged in resolving debts, payment defaults.** We may also transfer your debt information to default claimants in accordance with the rules prescribed by law. Telia has the right to provide data on debtors (i.e. persons who have not fulfilled their financial obligations to Telia in a timely and proper manner) to companies that manage debtors' information and that provide data to third parties for creditworthiness and debt management purposes. The data on the debtor will be submitted under the conditions provided by law only after the person has been notified of the violation of financial obligations.
- **Companies that have purchased the right of claim.** In accordance with the Law of Obligations Act, Telia (the creditor) has the right to transfer the right of claim for debt claims to another person who will become a new creditor as a result. Such transfer does not require the consent of the debtor and the latter may be notified either by Telia or by a new creditor.
- **Debt collection companies** to the extent necessary to initiate and enforce debt collection.

- **Providers of legal, audit and other special services, enforcement agents**, etc. On other **grounds established or permitted by law**.
- In connection with **mergers and acquisitions** and various business transactions and transfers.

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

8. How do we protect your personal data?

Information security and ensuring appropriate protection of personal data are vital for us. We implement the necessary organisational and IT 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. We pay special attention to the protection of personal data. We strive to implement security measures aimed at achieving an appropriate level of data protection and, thus, preventing the disclosure of personal data to unauthorised persons.

We ensure the confidentiality of the content and format of the messages you send. Telia implements appropriate measures to mitigate risks to the security of communications services and networks. The measures necessary to ensure security are established in the internal security rules of Telia. If necessary, we will specify on the **website** what specific measures Telia may use to mitigate the risks related to the security of the communications network.

Our employees are subject to data confidentiality and protection requirements, they receive personal data protection training, and are responsible for fulfilling their responsibilities. In addition, our partners (processors) are obligated to ensure that their employees comply with the same rules as Telia. Their employees are also responsible for complying with the requirements for the use of personal data.

[Learn more about Telia's general information security policies here.](#)

9. Your privacy choices and rights

What can you do to protect your personal data?

Although we at Telia pay great attention to ensuring the security of your personal data, you also have an important role to play in achieving this goal. To this end, please keep your contact information updated at all times. This will ensure that you receive the necessary security information. Before disclosing your personal data to third parties or entering it somewhere, consider whether you are aware of who the recipient of the data is and how secure it is kept.

Disclosure and sharing of passwords, ID card data, and other sensitive information with others is neither permitted nor reasonable. With regard to communication and Internet services, please note that by providing access to your data (e.g. via our self-service) due to negligence or other reasons, you provide access to call details, service details, invoicing information, and related party data.

If you suspect that your personal information has been processed in violation of our Privacy Notice or that your information has been disclosed to third parties, please let us know as soon as possible. In this way, we can resolve the situation as quickly as possible and help reduce potential damage. In the self-service environment, you can always view and modify your data, as well as control the right of access.

What are your rights in relation to your personal data?

- **Right of access.** At any time, you have the right to access your personal data, which Telia processes and retains. You also have the right to receive information about the following: purposes of data processing, types of personal data, recipients of data or categories of recipients to whom personal data have been disclosed and retention period of data. The application for access to data can be submitted both via Telia self-service environment and through Telia customer service. To do this, you need to properly authenticate yourself in advance and submit the corresponding request to us. We have the right to reply to such queries within 30 days.

For more detailed information and to submit an application/query, click [here](#).

- **The right to rectification.** If you have discovered incorrect or inaccurate personal data while reviewing your data, or your personal data has changed, you can always change or have it corrected, either via our self-service or by contacting the nearest Telia shop.

For more detailed information and to submit an application/query, click [here](#).

- **Right to erasure ('right to be forgotten')**. In certain cases, you have the right to ask Telia to erase your data. For example, if:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - you originally consented to the use of your data, but you have now withdrawn your consent on which the processing is based and there is no other legal ground for the processing;
 - you have objected to the processing and there are no overriding legitimate grounds for the processing (your interests outweigh the interests of Telia);
 - it has been established that your data has been collected and/or processed unlawfully;
 - Telia has a legal obligation to erase the data;
 - the data was collected from you as a child in the context of using an online service.

For more detailed information and to submit an application/query, click [here](#).

- **Right to restriction of processing**. In certain cases, you have the right to restrict the processing of your personal data by notifying us via Telia self-service or through Telia shop. This right can be exercised in the following cases:
 - to verify the accuracy of personal data if you have challenged its accuracy;
 - you have requested a temporary restriction on the use of your data while your request is being considered;
 - to record unlawful data processing;
 - you need personal data to prepare, file or defend a legal claim;
 - you have objected to the consideration of a legitimate interest and request to restrict the processing in question until a decision has been made.

However, you should take into account that the exercise of this right requires a very precise wording of the purpose and may in some cases lead to the temporary suspension of services.

For more detailed information and to submit an application/query, click [here](#).

- **Right to object**. You have the right to object to the processing of your personal data if your data is processed on the basis of a legitimate interest. In the event of an objection, we will consider the legal interests and, if possible, terminate the processing in question, unless we have compelling and legitimate reasons to continue processing your data. The right to object cannot be exercised in a situation where we need to make, file or defend a legal claim (e.g. we believe that a person has violated a contract and, therefore, we need to go to court or another law enforcement agency to defend our rights).

For more detailed information and to submit an application/query, click [here](#).

- **The right to data portability** gives you additional control over your personal data. We allow you to receive your personal data in a structured, common, and machine-readable format or to have it transmitted directly to another service provider (or controller) (provided that the other service provider has the capacity to receive the data in that format). Please note that Telia cannot guarantee this and is not responsible for the capacity of another service provider to receive such personal data.

Unlike the right of access to your data, your right to transfer data is limited by the following conditions:

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

For your convenience, we have solved the possibility of exercising this right, similarly to the solution of accessing personal data in the self-service.

For more detailed information and to submit an application/query, click [here](#).

- **Right to turn to Telia or a supervisory authority or a court**. You always have the right to contact us, the Data Protection Inspectorate or a court to protect your privacy rights and personal data. The Data Protection Inspectorate is a state agency that can be contacted or consulted on issues related to personal data protection.

10. How can you exercise your rights and contact us?

If you would like to receive additional information about the use of your personal data or need assistance with exercising your rights in the self-service, you can always contact our customer service by calling (+372) 639 7130 or sending an email to info@telia.ee.

If you are concerned that your personal information has been processed negligently or in violation of the Privacy Notice, you can always report it to our personal data protection expert by sending an email to privacy@telia.ee.

You also have the right to contact the Data Protection Inspectorate (<https://www.aki.ee/et>) or file a claim with the court to protect your privacy rights and personal data.

Once we have properly identified you, we will register your request and provide you with information on the action taken no later than one month of receipt of your request.

Telia is committed to conducting responsible and sustainable business. If you suspect that Telia has acted in violation of the law or the Privacy Notice, you can also notify Telia Company confidentially via the [Speak-up-line](#) (whistleblowing system).

[Learn more about privacy at Telia Company here.](#)

[Learn more about security at Telia Company here.](#)

11. Changes to this Privacy Notice

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 Notice up-to-date and available to you on Telia's website <https://andmed.telia.ee/privatsusteade>. For this reason, we encourage you to periodically visit our website, where you will always find the most current version of this Privacy Notice. We may also 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.