



Privacy Policy

When you use TDC Wholesale & Partnerships' products and services, you or your customers provide us with personal data. In our Privacy Policy, you can read about what data we collect, why we collect them and what we use them for. It is important for us to protect your personal data, and we hope you will take the time to read how we do this.

If you are a customer with one of the other brands in TDC Group, you can find a link to their website and privacy policy at [TDC Group](#).

TDC Wholesale & Partnerships' Privacy Policy typically concerns the personal data we have about you as a company employee. The company does business with TDC Wholesale & Partnerships and exchanges personal data about you in this connection to enable you to perform your work.

If you are the owner of a sole proprietorship, we will also have personal data about you, as you are then 'both the business and the person' in many situations.

In addition, we will also have personal data about our customers' end-customers. This is typically the case when the end-customer uses our network or has a product installed.

We also have information about your company's data, but this is not personal data. If you want to know more about our Privacy Policy on behalf of a company, the following will be relevant for you. However, our Privacy Policy primarily concerns personal data, which will typically be related to the company's employees.

[TDC Wholesale & Partnerships has a detailed Privacy Policy](#)

We also have supplementary descriptions of our Privacy Policy for our main product types which form part of our detailed Privacy Policy, which you can read about in clause 2.1.

When you do business with TDC Wholesale & Partnerships, the agreement is based on so-called 'Terms and Conditions'. You can read more about our Terms and Conditions [here](#).

Personal data and your rights

The General Data Protection Regulation contains rules on your rights as a private individual. We provide more information about this below.



Doc. 1994215

TDC Group has a Data Protection Officer

If you have any questions about TDC Group's processing of personal data, you are always welcome to contact our Data Protection Officer. You can find more detailed information at [TDC Group](#).

If you represent the company and have questions about, for example, data processing agreements, please contact your Account Manager at TDC Wholesale & Partnerships, and if you do not know who that is, please contact TDC Wholesale & Partnerships' Customer Service.

TDC Wholesale & Partnerships' Privacy Policy

TDC Wholesale & Partnerships deals primarily with businesses, which means that our customers are corporate customers. But we also have our customers' employees and endusers as users when we deliver products to our customers.

When we process personal data, these may, for example, concern the personal data of the customer's employees, the personal data of members of the management or the personal data of the company's owner. We may also have obtained personal data in connection with a dialogue with an existing or potential customer regarding a quotation.

Our customers will typically have their own end-customers to whom our customers make products available, and personal data are disclosed to TDC Group in this connection.

We also process personal data when persons contact us for other reasons or with whom we are in a dialogue in some other connection.

In the following, we refer to the persons whose personal data we process as, for example, 'you/your/customer/user/employee'.

1 About TDC Wholesale & Partnerships' Privacy Policy

Personal data (personal information) are data which can be related to a specific person (the 'data subject') such as name, address, telephone number and civil registration number, but also, for example, health data etc.

TDC Wholesale & Partnerships is responsible for ensuring that your personal data are protected when you use our services or visit our shops and websites.

In TDC Wholesale & Partnerships, we follow these principles:

Doc. 1994215

2



- Your personal data must be processed in a lawful and transparent manner.
- We collect or create personal data for a specific and legitimate purpose, which is clearly communicated.
- We only collect or create data that are relevant and limited to what is necessary for the purpose in question.
- The data are correct and kept up to date.
- We only store the data for as long as this is necessary to enable us to process them or for as long as this is required by the General Data Protection Regulation and current legislation.
- The data are processed with the necessary security measures.

TDC Wholesale & Partnerships' Data Protection Manager (DPM) is responsible for ensuring that these principles are met in TDC Wholesale & Partnerships, by our subsuppliers or partners and by the bodies to which the data are transferred.

This Privacy Policy is in accordance with the EU's General Data Protection Regulation, the Danish Data Protection Act (*Databeskyttelsesloven*) and other relevant legislation. The Privacy Policy and related pages, for example product or service descriptions, apply to TDC Wholesale & Partnerships and to any processing on behalf of or for TDC Wholesale & Partnerships.

Each company/unit in TDC Group has its own Privacy Policy, which you can find at the individual companies' websites or via TDC Group's website.

Who can you contact?

If you have any questions about this Privacy Policy and about how we process your data, please feel free to contact our Customer Service or your Account Manager.

If you suspect or know with certainty that there has been a breach of the rules on processing of personal data, you can also contact Customer Service.

Customer Service will forward any questions and complaints to our DPM if the problem cannot be solved by Customer Service.

Contents

In our Privacy Policy, you can read about the following:

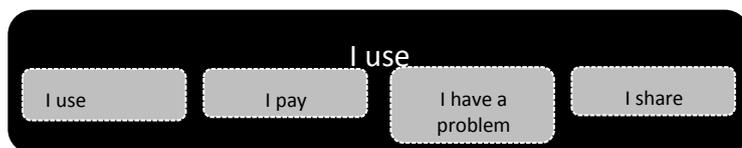
- What personal data do we collect, how do we collect them and how do we use them?
- Who has access to your data and for how long do we store them?
- How do we protect your data?



- Your rights.
- General information about data security and security policies in TDC Wholesale & Partnerships
- Who should you contact if you have any questions or enquiries?

2 What personal data do we collect, how do we collect them and how do we use them?

TDC Wholesale & Partnerships collects personal data to be able to deliver products and services to you and to improve our products and services. The data are collected or created when, for example, you visit our websites (cookies), participate in surveys (Appendix 1: Privacy Policy for customer satisfaction surveys performed by brands in TDC Group, page 16), register as a new customer or use our products or services. Our customer journey below illustrates the various steps required for our provision of services to you:



Below, you can find general information about how we collect and process your personal data in the different parts of the customer journey, and you will also find details about the various types of data processing.

Step 1: I register/change

TDC Wholesale & Partnerships collects your personal data to be able to deliver the products and/or services that you request when you become a customer with TDC Wholesale & Partnerships or change a registration with us. Our legal basis for collecting these data is primarily based on contractual requirements. Sometimes our legal basis is a legitimate interest in meeting the customer's expectations. The data are collected for handling, provisioning, installation and performance of the contract.

The data we collect for these purposes are typically name, address, telephone number, email address, civil registration number, IMEI number (the unique number of your telephone), ICC number (the unique ID number of your SIM card), your order information and your credit card details (if you would like automatic payment). We primarily collect the data via email, telephone or online.



Order handling, delivery, installation and execution of the order may be handled by subsuppliers, depending on the type of product or service you have ordered. The processing of personal data in connection with delivery is described for each product or service in step 2: 'I use', where you can see a list of our products and services.

A change from one product to another, for example upgrading your Internet connection, is handled in the same way in which we handle a new order. However, the difference is that we have already registered you as a customer in case of a change of product, which means that we do not need to collect more personal data to implement the change. Activities in connection with changing products are described in the customer journey under step 1: 'I register/change', and the handling will be the same as described under 'Products and services'.

In connection with accounting processes (e.g. invoicing), our Finance Department may send the relevant data that are to be used to our third-party subsupplier, which may be located outside the EU.

Step 2: I use

Step 2: 'I use' covers four areas:

- I use, which concerns processing of data which occurs when you use a product or service.
- I pay, which concerns payment for use of the service or product (invoicing).
- I have a problem, which concerns support for you if you experience problems with the service or product.
- I share, which concerns any action involving social media, for example Facebook.

I use

Here, we collect data on your use of TDC Wholesale & Partnerships' products. We do this to ensure, among other things, that you have a good and consistent user experience, to enable us to provide the service you have requested and to ensure a correct basis for your invoice.

Our legal basis for this collection of data consists of both contractual requirements and legitimate interests.

When you take one of our products or services into use, we only need some of the data you gave us when you registered with us (step 1). In some cases, we collect or create further data when you use our products or services, for example our email services. Your contact lists, calendars and information in the emails you receive and write will definitely contain personal data. In some cases, personal data are created when you use our products and/or services, for example location data, which are created in our mobile services, and cookies, which are created when you visit our websites.



The type of data collected or created and how we handle and protect the data are described in detail for each product and/or service under 'Products and services'.

I pay

Here, TDC Wholesale & Partnerships uses your data collected in step 1 'I register' to be able to, among other things, credit rate you, follow up on your payments, register you for Betalingservice (Direct Debit) if you so wish, and improve our payment procedures and systems. Your data are collected on the basis of a contractual obligation and a legitimate interest.

The data we typically collect and use for these purposes are your name, address, telephone number, invoicing status, usage and bank details. We also collect and use your civil registration number for credit rating, identification, anti-fraud measures and, if required, debt collection and refund via your bank account in connection with credit notes. We use external debt collection agencies for collection of debt and banks to perform refunds, and we disclose your civil registration number and the above data to these.

In connection with accounting processes (e.g. invoicing), our Finance Department may send the relevant data which are to be used to our third-party subsupplier, which may be located outside the EU.

I have a problem

Here, we help you by answering any questions you may have in connection with your subscription or your service with TDC Wholesale & Partnerships. This applies, for example, to questions about your invoice, if you cannot get your product to work or if you have questions about self service. Our legal basis may be both a contractual obligation and a legitimate interest, depending on the type of support we provide to you as a customer. We distinguish between three types of support: Remote support, field support and retail support, but, in most cases, we need the same personal data.

To enable us to identify you as a customer, find the correct information in our systems and respond to an enquiry from you, we will normally ask you to state your name, telephone number and customer number/account number, either over the telephone, via email or by online contact. Any other personal data that we require will depend on what your enquiry concerns. If, for example, it concerns your invoice, we will retrieve your usage data so that we can account for the invoice in question. If your enquiry concerns how you use our selfservice system, we will guide you through this. We collect these data through our systems.

Some of our subsuppliers which help us solve your problems may be located outside the EU.



You can read more about this under 'Access and sharing of information', and you can also find more information under 'Products and services', where you can read more about whether some of your personal data are disclosed to a subsupplier, and whether this subsupplier is located outside the EU.

I share

Here, we provide support for you as a customer or potential customer via social media or use social media as a marketing platform.

When we provide you with support, we need to be able to identify you as a customer and find the correct information in our systems, and we will normally ask you to state your name, telephone number and customer number/account number, either over the telephone, via email or by online contact. Any other personal data that we require will depend on what your enquiry concerns. If, for example, your enquiry concerns how you use our self-service system, we will guide you through this. We collect these data through our systems.

Some of our subsuppliers which help us solve your problems may be located outside the EU.

You can read more about this under 'Access and sharing of information', and you can also find more information under 'Products and services', where you can read more about whether some of your personal data are disclosed to a subsupplier, and whether this subsupplier is located outside the EU.

Our legal basis for such targeted banner advertising and advertisement placement falls within TDC Wholesale & Partnerships' legitimate interest.

The data we normally use for these purposes are your email address, the TDC Wholesale & Partnerships products or services you have, and your film and music usage via TDC Wholesale & Partnerships' services. We use these data to make the banners more relevant to you as a customer. We collect the data through our systems.

Step 3: I leave

In this step, you have chosen to terminate your subscription or your service with TDC Wholesale & Partnerships. We therefore process your data to be able to terminate your subscription or service. The contractual obligation forms the basis of this processing.

The data we need to be able to terminate your subscription or your service are generally only your name, address and telephone number. If we are in doubt as to whether we have found the right customer, we may ask you to provide us with other personal data (e.g. your



civil registration number) to ensure that we do not erroneously terminate a subscription or a service for another customer. When we have ensured that we have found the right customer, we will terminate your subscription or service in our systems. If you are registered for automatic payment, we will terminate this as well.

When we close down your account, we will erase the data which are no longer necessary. The data in question will depend on the individual services and products. You can find the specifications under 'Products and services'.

2.1 Products and services

Here you can find more information about how we handle your personal data for a specific product and/or service:

- Broadband Coax, Fibre & DSL (page 23)
- Landline BBT (page 25)
- Landline ISDN/PSTN (page 28)
- Mobile (page 31)
- TV (page 34)
- Transmission (page 37)

2.2 Consent

Some data processing activities require your express consent, for example processing which is not necessary to enable us to perform a contract or processing for non-legal reasons such as marketing and customer surveys. In these situations, we need your consent to our collection and processing of your personal data. The consent contains an explicit specification of the data that we process, how we process the data and why. It also states the period in which your consent is valid.

As a data subject, you always have the right to withdraw your consent. TDC Wholesale & Partnerships ensures that it is just as easy to withdraw consent as to give consent.

TDC Wholesale & Partnerships stores documentation to prove that you have given your consent to our processing of your personal data.

3 Who has access to your data and for how long do we store them?



3.1 Access and sharing of information

To ensure that only the relevant persons have access to your personal data when helping you in one of the steps in TDC Wholesale & Partnerships' customer journey, we have introduced stringent access restrictions to the systems in which the data are stored and processed.

This means that an employee does not have access to your data unless he or she needs to perform a task necessary to provide you with a service or product. Depending on the task to be performed, the employee will only have access to the data necessary for the performance of the task. We also require that our partners and subsuppliers are equally restrictive if they handle your personal data on our behalf.

In exceptional cases, we share data with partners and subsuppliers in the following situations:

- For external processing of your data to provide you with a product or service. In situations in which we share (transfer) data to a subsupplier or partner, we will only transfer the data they need to perform their part of the assignment. We also ensure that the subsupplier or the partner processes the data in a secure and confidential manner and that they follow our instructions.
- With your consent: We only share personal data with companies, organisations or persons outside TDC Wholesale & Partnerships when you have given your consent to this.
- For legal reasons: To enable us to comply with legislation, other regulations and legal processes or to comply with legitimate requests from public authorities.
- To enable us to enforce our terms and conditions for the individual service, including when we need to investigate potential breaches.
- To enable us to detect, prevent or otherwise address fraud, deceit, security problems or technical problems.
- To enable us to protect ourselves against violations of rights or security breaches and against damage to TDC Group's property, our users or the general public as required by law or as otherwise permitted.

A subsupplier may have parts of its products and/or services located in a country outside the EU (a so-called third country), and your data are therefore transferred outside the EU. In these situations, our subsuppliers are obliged to ensure that the same security regulations and measures that protect your data within the EU are also applied to the data transferred outside the EU. This means that your personal data are equally safe regardless of whether they are processed within the EU or in a third country.



You can read more about what types of data are transferred to what types of sub-suppliers under 'Products and services', and about whether a sub-supplier processes your data within the EU or in a third country.

3.2 Storage of data

TDC Wholesale & Partnerships does not wish to store your data for longer than required by law, than what is necessary to provide our services to you, or than what is necessary to be able to trace your information in the event of incidents, disputes etc. We may also store your data for a period after you have terminated your agreement with us, so that we can reactivate your account if you so wish (during the cooling-off period) or if you have any questions about how we have processed your data while you were a customer with us.

We have a general policy on how long we store specific types of data; however, there may be exceptions to this policy, so we recommend that you read the descriptions under 'Products and services', which contain information about the data storage period for each product or service.

We also wish to ensure that the data storage period (the period in which we store your data) which we use in our own systems also applies to our sub-suppliers. They do not wish to store your data for longer than we do.

4 How do we protect your data?

To ensure that your data are processed securely, we have implemented an information security management system based on the ISO 27001 best practice and the IPD (Insurance & Pension Denmark) standard. This system includes management, processes and other administrative, technical and physical controls which ensure that TDC Group's IT environment is secure in terms of confidentiality, integrity and accessibility.

You can read more about how TDC Group works with information security here: <https://tdcgroup.com/-/media/images/tdccom/privacy/ISMS-Privatlivspolitik04.ashx?la=en>

We also attach special importance to the systems and applications in which your personal data are processed. We have special security requirements and controls for each of these systems. You can read more about these requirements under 'Products and services'.

The security requirements and controls apply to both TDC Group and our sub-suppliers so that we ensure that the entire service supply chain is secure. We conduct audits and security checks, for example vulnerability and penetration tests, both on our own systems and on systems hosted or operated by our sub-suppliers to verify implementations.

Some of our services are also security certified and subject to external ISAE audits.



The IT environments, systems and applications TDC Group and TDC Wholesale & Partnerships use to provide customer service and products as well as for storage or processing of personal data have been assessed and designed so that they are as secure as possible.

5 Your rights

We respect your rights, and the data you provide us with belong to you.

You have the right to access, rectify, export and withdraw consent to the processing of your data. TDC Wholesale & Partnerships acts in accordance with EU rules and Danish legislation.

People have different needs for the protection of their personal data. We do our utmost to make it clear what data we and our trusted partners collect, so you have good opportunities to exercise your right to access, rectify, export, erase or withdraw consent for the processing of your personal data.

5.1 Duty of disclosure

As a TDC Wholesale & Partnerships customer – i.e. either a customer's employee or a customer's end-customer – you have the right to receive information about the personal data that we process.

The personal data that TDC Wholesale & Partnerships can provide you with information about will depend on what services and products you are using. You can read more about the following data under the privacy policy for the individual products:

- The purpose of the data processing.
- The types of personal data about you that we process.
- The organisation which will have access to your personal data.
- The period in which we store the personal data.
- The sources from which we have obtained the data if they have not been collected from you.
- About the relevance, details and importance of profiling or automated decisions made on the basis of your personal data. If relevant, 'Safeguard' is used for international transfers.

You can also request a copy of your personal data. Read more under 'Right of access' further down on this page.



5.2 Right of access

As a data subject with TDC Wholesale & Partnerships, you have the right to have your personal data sent to you. To protect your personal data, TDC Group must verify your identity in a relevant manner before we grant you access to your data.

The personal data which TDC Wholesale & Partnerships can send to you will depend on what services and products you are using. If TDC Wholesale & Partnerships processes personal data about you, we can, at your request, send you information about:

- The purpose of the data processing.
- The types of personal data about you that we process.
- The organisation which will have access to your personal data.
- The period in which we store the personal data.
- The sources from which we have obtained the data if they have not been collected from you.
- About the relevance, details and importance of profiling or automated decisions regarding your personal data. If relevant, 'Safeguard' is used for international transfers.

You can request access to your data at TDC Wholesale & Partnerships.dk. We handle all requests as quickly as possible, and you will receive a confirmation within a month indicating that the transfer has been made or when we expect it to take place. You can contact your Account Manager or Customer Service via wsok@branchesalg.dk if you want access to your data.

5.3 Right to rectification

TDC Wholesale & Partnerships ensures that the stored and collected personal data are correct. In cases in which you believe that they are inaccurate or incomplete, we encourage you to contact us so that we can rectify the data.

However, TDC Wholesale & Partnerships has the right to reject your request if it is unfounded, or if we repeatedly receive requests from you. In such cases, we reserve the right to charge an administrative fee. We also reserve the right to reject your request if it is pointless.

You may request to have your data rectified by contacting our Customer Service. We handle all requests as quickly as possible, and you will receive a confirmation within a month indicating that your data have been rectified or when we expect this to take place.

5.4 Right to erasure

TDC Wholesale & Partnerships is obliged to follow the Danish legislation on collection and storage of contracts and invoices. For personal data which are not covered by the legislation, TDC Wholesale & Partnerships has a standard erasure policy to ensure that no personal data are stored for longer than necessary.

You have the right to have your personal data erased by TDC Group when:

- The personal data are no longer required (if you are no longer a customer of TDC Wholesale & Partnerships, and we are thus no longer entitled to store the data).
- You withdraw your consent (see consent).
- You object to the processing, and we do not have a legitimate reason to process your data.
- The data have been processed unlawfully.
- There is a legal obligation under EU regulation and Danish legislation. You do not have the right to have your data erased to the extent that processing is necessary:
 - for exercising the right of freedom of expression and information
 - for compliance with a legal obligation which requires processing by EU or Danish law
 - for reasons of public interest
 - for archiving purposes related to public interests, scientific or historical research purposes or statistical purposes
 - for the establishment, exercise or defence of legal claims.

You may request to have your data erased by contacting our Customer Service. We handle all requests as quickly as possible, and you will receive a confirmation within a month indicating that your data have been erased or when we expect this to take place.

5.5 Right to data portability

You also have the right to receive your personal data, in a structured, commonly used and machine-readable format, when you have yourself provided the data to TDC Wholesale & Partnerships. You may also have the data transmitted to another supplier. This right is known as data portability. This applies when:

- you have given your consent to the processing, or when processing is performed on the basis of a contract, and
- the processing is performed automatically (electronically).

5.6 Right to object

You have the right to object to TDC Wholesale & Partnerships' processing of your personal data if the processing is in conflict with the rules of the personal data protection legislation or other legislation. If the objection is justified, TDC Wholesale & Partnerships will restrict the processing as described below.

5.7 Right to restriction of processing

You have the right to have the processing of your personal data stopped if:

- You believe that the data are incorrect. TDC Wholesale & Partnerships will stop our data processing until we have had confirmation that the data are correct.
- The processing is unlawful. Instead of having the data erased, you can have the processing stopped.
- TDC Wholesale & Partnerships no longer needs the personal data to meet the original purpose of the processing, but we must store the data for the establishment, exercise or defence of legal claims.
- You object to the processing in accordance with Article 21 of the General Data Protection Regulation.
- Your personal data are restricted. There are cases in which we may continue our processing. Personal data which have not been stored will only be processed:
 - with your consent
 - for the establishment, exercise or defence of legal claims
 - for the protection of the rights of another natural or legal person
 - for reasons of important public interests of the EU or of a member state.

If you have had the processing of your personal data restricted, we will inform you before the restriction of the processing is lifted.

6 General information about data security and privacy policies in TDC



6.1 Compliance and cooperation with regulatory authorities

TDC Group's Data Protection Officer is responsible for continuously monitoring and checking that TDC Wholesale & Partnerships and our partners and subsuppliers comply with the General Data Protection Regulation and the security requirements we find necessary to protect your personal data.

Our Data Protection Officer collaborates with the Danish Data Protection Agency and other local supervisory authorities on compliance with the personal data protection rules and complaints which cannot be settled by TDC Wholesale & Partnerships.

6.2 Changes to the Privacy Policy

We continuously review our Privacy Policy and update it if there are changes to our data processing, and this website will therefore reflect this. If there are changes to the products or services you receive, you will get an email from us describing these changes.

Appendix 1: Privacy Policy for customer satisfaction surveys performed by brands in TDC Group

This Privacy Policy applies to all TDC business units which use customer satisfaction data in TDC Group

Brands in TDC Group work determinedly to improve the customer experience with their services and products, and your feedback is therefore an important help for them to improve.

In connection with your participation in one of TDC Group's satisfaction surveys, TDC's Data & Advanced Analytics department collects and processes, as data controller, a number of personal data about you.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

TDC Group wishes to create the best conditions for being able to provide you with good experiences and to develop products and services so that they meet your needs and requirements optimally. We therefore collect information about your satisfaction and wishes for us in order to:



- Prioritise areas of improvement in our business units within communication, products, processes and service
- Optimise internal processes and systems (knowledge about your experience of stability, breakdowns and inconveniences)
- Provide employees with training enabling them to deliver a service that meets your expectations
- Create a basis for customising the experience to provide you with relevant services
- Assess the future development in the number of customers across all responses.

The above is based on your answers to the customer analysis compiled with a collection of dedicated data points (product data, demographics, use of the Group's products etc.) from TDC's Data & Advanced Analytics unit.

Automated profiling

We use analytical methods in some of our contact points to assess whether you need specific help or service, including your answers regarding your satisfaction with your contact with us.



Types of data

In customer satisfaction surveys, we collect and process the following types of personal data about you:

- Name (first name and surname)
- Telephone number
- Your customer number
- Postcode
- Your answers and feedback to us in our customer satisfaction surveys
- IP address (in connection with participation in customer satisfaction surveys on our websites)
- Order number (in connection with participation in customer satisfaction surveys after purchase or fault repair).

In order to create 100% security regarding your participation, our policy is not to register sensitive personal data that you may have given us as part of a personal telephone interview, and, as a general rule, we encourage you not to provide sensitive personal data in other customer satisfaction surveys.

Sources

TDC Group collects your satisfaction data via

- external partner for personal telephone interviews
- external partner for IVR telephone customer surveys
- external partner for text message web-based customer surveys
- survey system provided by an external partner for email customer surveys, chats and online pop-ups.

All suppliers with which we collaborate comply with the applicable rules and meet the same high requirements for the protection and processing of your personal data as TDC Group.

As part of the data processing, personal data may have been collected via one data processor and, in certain cases, disclosed to another data processor which will assist us with overall reporting in specific areas. TDC has entered into data processing agreements with all our suppliers so that we ensure that they comply with the same responsibility for the protection and processing of your personal data as TDC Group itself.

In addition, non-personal data are purchased from publicly available data sources (e.g. BBR, Conzoom, Statistics Denmark, business registers and other third parties) to enable us to deliver solutions and services that best meet our customers' needs and requirements.



Legal basis for collecting and processing personal data

The legal basis for our collection and processing of your answers to the customer satisfaction survey is that you give us permission to do so (your consent).

It is important to us that you find that we protect your data. We will therefore not contact you in connection with our customer surveys without having permission to do so. And we therefore ask you whether you wish to participate in our questionnaires before registering your answers. We always accept a no as well as your wish not to participate in future surveys.

Disclosure of your personal data

Personal data will not be disclosed to any third party – unless there is an explicit agreement on this.

Transfer of personal data to recipients in countries outside the EU/EEA

We do not transfer your personal data and answers in customer satisfaction surveys to recipients in countries outside the EU/EEA.

Your feedback to us is stored by our Data & Advanced Analytics department. We use suppliers in India and Pakistan to support our general data storage. We have entered into data processing agreements with these partners, which means that you can rest assured that your data are protected in accordance with European data protection legislation and Danish legislation.

Storage period

We store your personal data for as long as this is necessary for the above purposes; however, not for more than five years for former customers. Detailed CDRs (call detail records) are stored for 12 months, and marketing data are stored for two years.

Contact us for further information

Your participation in TDC Group's customer surveys is appreciated, and your answers make it possible for brands in TDC Group to become better at delivering a consistent and improved service experience, and at developing products and solutions in the areas that matter the most to you.

We therefore take the protection of your data and answers seriously. If you have any further questions about how we process your data, have comments, do not wish to participate in customer surveys from brands in TDC Group or wish to be erased, please feel free to contact us via the individual brands, which you can find here:

[<https://tdcgroup.com/da/ansvarlighed/persondata>].



Appendix 2: TDC Business Intelligence (BI) Privacy Policy

This Privacy Policy applies to TDC business units which use BI (Data & Advanced Analytics) services

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in connection with the use of BI (Business Intelligence) Data & Advanced Analytics.

TDC Group is at the forefront when it comes to using BI to create the best conditions for creating good customer experiences and sound business opportunities.

Based on our internal data about our customers, we daily prepare analyses and make them available to our business units so that they are able to:

- Assess market trends (purchases, sales, churn, porting, customer satisfaction)
- Make operational performance ratings (calls to customer centres, performance reports, overview of launched sales initiatives, customer centre activities, prediction of sales/churn/calls/conversions, regional initiatives etc.)
- Create a better basis for customising the customer experience (categorise customer segments, churn, potential customers, additional sales opportunities, recommendations) in order to provide a relevant customer experience
- Optimise our internal processes and systems (reporting overview, heatmaps, breakdown, service levels etc.)
- Optimise our use of financial funds (distribution of operating budgets for marketing, sales, customer service, technicians, staff and customer-oriented units).

To support these objectives, TDC uses a number of analytical methods to create insight into and knowledge about our business. These methods include:

- **Data management** in the form of a compilation of internal data from our customer systems for the purpose of answering questions
- **Descriptive data analysis and reporting** with a view to providing an overview of customer movements, financial assessments and trends in the customer base
- **Advanced analytics** in order to prevent abuse and to improve the customer experience as well as predicting customer development and business trends



- **Machine learning** for statistical development of customer recommendations, churn segments, CLV, customer segments etc.
- **Deep learning** for image and text analysis.

The above is based on a collection of dedicated data points (product data, demographics, use of the Group's products etc.), which enables us to answer the above questions efficiently.

Our customer contact is always subject to applicable rules on permissions, so that we do not actively contact our customers without TDC Group having the legal authority to do so. Automated profiling is not used.

The right to opt out of the analysis

If a customer does not wish to be included with his or her data in our BI and machine learning analyses, the customer must contact his or her brand in TDC Group. Here, you can opt out of inclusion in analyses.

Categories of data subjects

- Business customers
- Private customers and employees
- Potential customers (via marketing consents).

Types of data

We collect and process the following types of personal data about our customers:

- Name
- Address
- Telephone number
- IP address
- Passwords to TDC Business's self-service systems
- MAC address of connected equipment
- WIFI SSID
- WIFI SSID password
- LID number of the connection so that we can register it in our systems.

Sources

Personal data are collected from TDC Group's production systems and are gathered in a data warehouse, from which data are used for the above analyses. Third-party non-personal data



are purchased from publicly available data sources which can enhance the data basis (e.g. BBR, Conzoom, Statistics Denmark, business registers etc.).

Legal basis for collecting and processing personal data

The legal basis for our collection and processing of personal data is as follows:

- Weighing of interests
- Legal obligation (logging, accounting etc.) • Consent.

Disclosure of your personal data

Personal data will not be disclosed by BI to a third party.

Transfer of personal data to recipients in countries outside the EU/EEA

We transfer personal data to the following recipients in countries outside the EU/EEA:

- In some cases, personal data can be transferred to subsuppliers which handle secondlevel support and system operation located outside the EU (India and Pakistan) to provide the necessary technical assistance. We have entered into data processing agreements with all our subsuppliers to ensure that data are protected in accordance with the General Data Protection Regulation and Danish legislation.

Storage period

We store personal data for as long as this is necessary for the above purposes; however, not for more than five years for former customers. Call details are stored for 12 months, and marketing data are stored for two years.

Contact us if you want to know more

If you want further information, please contact Customer Support.

Appendix 3: Product or service-specific Privacy Policy



Privacy Policy for Broadband COAX/DSL/Fibre

In connection with your use of the Broadband (COAX/DSL/Fibre) product, TDC Group collects and processes, as data controller, a number of personal data about you.

The following varieties of the Broadband (COAX/DSL/Fibre) product are included under this Privacy Policy: Broadband COAX, Broadband DSL and Broadband Fibre.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the use of the Broadband (COAX/DSL/Fibre) product, the following personal data are collected, verified or processed in our internal systems:

- Email address
- Customer number
- IP Address
- LID/Circuit ID
- URL content
- Passwords (encrypted)
- User administration and access to applications.

The purposes for which we collect and process data are:

- Data are collected to enable the customer to access the Internet via the customer's broadband connection (COAX/DSL/Fibre) as well as to improve the relationship between TDC Wholesale & Partnerships and the customer.

Type of processing of personal data:

- The customer's data are processed so that TDC Wholesale & Partnerships can assess what additional products the customer can be offered. The customer's activity level is also logged as well as logging of the customer's specific activities.

Automated individual decision-making

- Personal data are not processed for automated individual decision-making or profiling.

Sources

If you have the Broadband (COAX/DSL/Fibre) product, TDC Group collects personal data from the following categories:

- Customers
- Customers' end-customers.



Legal basis for collecting and processing personal data

- The legal basis for our collection and processing of personal data in connection with the use of the Broadband (COAX/DSL/Fibre) product is a contractual obligation and a legal obligation.

Disclosure of your personal data

In connection with your Broadband (COAX/DSL/Fibre) product, TDC Group transfers your personal data for the purposes of support, fault repair and installations on networks, products and equipment. The data are transferred to Danish service providers which perform the work in collaboration with TDC Group.

The legal basis for the disclosure of personal data is as follows:

- Contractual obligation to the customer to facilitate the product requested or purchased by the customer.

Transfer of personal data to recipients in countries outside the EU/EEA

- TDC Group does not transfer your personal data to recipients in countries outside the EU/EEA.

Storage period

- We store your personal data for as long as this is necessary to enable us to meet the purposes stated above in connection with your use of the Broadband (COAX/DSL/Fibre) product.

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:

[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details about the processing of personal data in connection with the delivery of the Broadband (COAX/DSL/Fibre) product, please contact us via our Customer Support.



Appendix 4: Product or service-specific Privacy Policy

Privacy Policy for Landline BBT

In connection with your use of the Landline BBT product, TDC Group collects and processes, as data controller, a number of personal data about you.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the use of the Landline BBT product, the following personal data are collected, verified or processed in our internal systems:

- Telephone number
-
- LID/Circuit ID
- Customer call details (including called party numbers)
- Location data
- Voicemail; content and call numbers
- Whether the customer has reached his or her limit
- Whether the customer is barred for international telephony
- Received calls
- Date, time and call duration
- Whether the customer is registered for barring of miscellaneous services.

The purposes for which we collect and process data are:

- Personal data are collected and processed to ensure that the customer can make and receive calls, listen to voicemail and have calls forwarded. Moreover, data are processed to generate an invoice for the customer.

Type of processing of personal data:

- Telephone conversations and/or calls are transmitted and traffic data are collected for use for settlement with the customer.

Sources

If you have the Landline BBT product, TDC Group collects personal data from the following categories:

- Customers (for use for invoicing)
- Customers' end-customers.



Legal basis for collecting and processing personal data

- The legal basis for our collection and processing of personal data in connection with the use of the Landline BBT product is a contractual obligation and a legal obligation.

Disclosure of your personal data

- Your personal data are disclosed and shared for the purpose of providing support and performing fault repair of customers' connections, and the data are disclosed to a network and telecommunications company which supports TDC Group on the network.

The legal basis for the disclosure of personal data is as follows:

- A contractual obligation to the customer to facilitate the service/product requested or purchased by the customer.

Transfer of personal data to recipients in countries outside the EU/EEA

- TDC Group does not transfer your personal data to recipients in countries outside the EU/EEA.

Storage period

- We store your personal data for as long as this is necessary to enable us to meet the purposes stated above in connection with your use of the Landline BBT product.
- This period typically ranges from six months to five years.

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:

[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details about the processing of personal data in connection with the delivery of the Landline BBT product, please contact us via our Customer Service.



Appendix 5: Product or service-specific Privacy Policy

Privacy Policy for Landline (ISDN/PSTN)

In connection with your use of the Landline (ISDN/PSTN) product, TDC Group collects and processes, as data controller, a number of personal data about you.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the use of the Landline (ISDN/PSTN) product, the following personal data are collected, verified or processed in our internal systems:

- Telephone number
- LID/Circuit ID
- Whether the customer is registered for barring of miscellaneous services.
- Customer call details (including called party numbers)
- Location data
- Voicemail; content and call numbers
- Whether the customer has reached his or her limit
- Whether the customer is barred for international telephony
- Received calls
- Date, time and call duration.

The purposes for which we collect and process data are:

- To enable the customer to make and receive calls, listen to voicemail and have calls forwarded. To enable us to generate an invoice for the customer.

Type of processing of personal data:

- Telephone conversations and/or calls are transmitted and traffic data are collected for use for settlement with the customer.

Sources

If you use the Landline (ISDN/PSTN) product, TDC Group collects personal data from the following categories:

- Customers (for use for invoicing)
- Customers' end-customers.

Legal basis for collecting and processing personal data



- The legal basis for our collection and processing of personal data in connection with the use of the Landline product is a contractual obligation and a legal obligation.

Transfer of personal data to recipients in countries outside the EU/EEA

- Personal data are transferred to an American company, located in the United States, which facilitates the generation of invoices for this product.

The legal basis for the disclosure of personal data is as follows:

- Legitimate interest in invoicing the customer for usage of the purchased product.

Storage period

- We store your personal data for as long as this is necessary to enable us to meet the purposes stated above in connection with your use of the Landline (ISDN/PSTN) product; however, in accordance with the Danish Bookkeeping Act (*Bogføringsloven*), some of your data are stored for up to five years.

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:

[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details on the processing of your personal data in connection with the delivery of the Landline (ISDN/PSTN) product, please contact us via our Customer Support.



Appendix 6: Product or service-specific Privacy Policy

Privacy Policy for Mobile

In connection with your use of the Mobile product, TDC Group collects and processes, as data controller, a number of personal data about you.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the use of the Mobile product, the following personal data are collected, verified or processed in our internal systems:

- Telephone number
- IMSI/ICC number
- IMEI number
- Customer call details (including called party numbers)
- Text and image messaging details about message recipients and times
- Location data
- URL content
- Voicemail; content and call numbers
- Audio files, for example recordings of customer calls in Customer Service
- Data about the customer's access to Cube IO Visual Voicemail
- Whether the customer has reached the limit
- Whether the customer is barred for international telephony
- Whether the customer is registered for barring of miscellaneous services.
- The customer's data usage.

The purposes for which we collect and process data are:

- To enable the customer to make and receive calls, send and receive text and multimedia messages and use data on the customer's mobile phone and to be able to generate an invoice based on the customer's usage.

Type of processing of personal data:

- Data are processed in connection with transmission of the customer's telephone calls, text messages and data as well as in connection with storage and collection of call detail records.

Automated individual decision-making

- Personal data are not processed for automated individual decision-making or profiling.



Sources

If you have the Mobile product, TDC Group collects personal data from the following categories:

- Customers
- Users under the age of 18
- Company employees
- The company's end-customers
- Telephone numbers of customers' outgoing calls.

Legal basis for collecting and processing personal data

- The legal basis for our collection and processing of personal data in connection with the use of the Mobile product is a contractual obligation and a legal obligation.

Disclosure of your personal data

- In order to provide support for and perform fault repair on the mobile network, some of your data are disclosed to third-party network and telecommunications companies, which access the data in the event of faults requiring external support. Furthermore, data are disclosed to a software company which supports our voicemail service. Finally, we collaborate with a technology company, which provides us with support in connection with the blocking of stolen devices. The purpose of all disclosure of data is to provide you with the best possible customer service.

The legal basis for the disclosure of personal data in this section is as follows:

- A legitimate interest in providing the best possible service to customers as well as a contractual obligation to maintain the service or the product purchased by the customer; in this case Mobile.

Transfer of personal data to recipients in countries outside the EU/EEA

- TDC Wholesale & Partnerships does not transfer your personal data to recipients in countries outside the EU/EEA.

Storage period

- We store your personal data for as long as this is necessary to enable us to meet the purposes stated above; however, in accordance with the Danish Bookkeeping Act (*Bogføringsloven*), some of your data are stored for up to five years.

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:



[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details about the processing of personal data in connection with the delivery of the Mobile product, please contact us via our Customer Support.

Appendix 7: Product or service-specific Privacy Policy

Privacy Policy for TV

In connection with your use of the TV product, TDC collects and processes, as data controller, a number of personal data about you.

The following varieties of the TV product are included under this Privacy Policy: TDC TV Box, Smart TV, TDC App, Rental Movies and tv.yousee.dk.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the use of the TV product, the following personal data are collected, verified or processed in our internal systems:

- Name
- Address
- Telephone number
- Email address
- Customer number
- IP address
- Account number
- Location data
- Usage of films via TDC services
- Access codes
- Overview of the customer's existing agreements with TDC Group
- Information about arrears, reminders and repayment schemes
- Billing status
- The services/products which the customer has purchased from TDC Group



- Customer order
- Customer behaviour on accessible content
- The unit(s) which are/have been connected
- If another telecom provider is used for connection to streaming.

The purposes for which we collect and process data are:

- To enable the customer to watch TV/content and to enable TDC to verify the content to which the customer is to have access and to make it possible to perform fault detection in the event of breakdown or fault.

Type of processing of personal data:

- Sending of content to the customer based on the customer's rights as they are registered in the order management system, as well as registration and communication of the customer's usage.

Supplementary products

- Via your customer relationship in connection with TDC's TV production, you will also be able to watch rental movies; you can read a separate privacy policy on this at TDC Group's website.
- As a customer, you may also use the supplementary product YouSee More if you have more than two YouSee main products (mobile, broadband or TV). You can read a separate privacy policy for YouSee More at its website.

Automated individual decision-making

- Personal data are not processed for automated individual decision-making or profiling.

Sources

If you have the TV product, TDC collects personal data from the following user categories:

- Customers
- Customers' end-customers.

Legal basis for collecting and processing personal data

- The legal basis for our collection and processing of the personal data you provide to TDC is our contractual obligations to our customers, as these data are processed in connection with the delivery and optimisation of the ordered product.

Disclosure of your personal data

- To enable us to ensure that the delivery of the TV product works impeccably, we disclose some data to selected technology companies. These data are disclosed for the purpose of fault repair and provisioning of the desired content to each individual TV recipient. Furthermore, we disclose data to a research company to meet requirements from copyright holders, which is a statutory requirement.

The legal basis for the disclosure of personal data in connection with the TV product is as follows:

- Personal data are disclosed based on a legitimate interest and to enable TDC to meet the contractual obligation we have to you as a customer.

Transfer of personal data to recipients in countries outside the EU/EEA

- When you use the TV product, some of your data will be collected in systems with data processing centres located in the United Kingdom and the United States, respectively, and thus outside the EU/EEA. The data from these systems are all used for analysing performance and to ensure optimal product delivery. Furthermore, TDC will store data with a company with a data processing centre in Ireland to host and operate our applications.

Storage period

- We store your personal data for as long as this is necessary to enable us to meet the purposes stated above, which, for the TV product, can range from 30 days and until you, as a customer, ask us to erase them.

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:

[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details about the processing of personal data in connection with the delivery of the TV product, please contact us via our Customer Support.

Privacy Policy for TDC Wholesale – Transmission Products

In connection with your use of Transmission Products, TDC Wholesale collects and processes, as data controller, a number of personal data about the end-user.

The following varieties of Transmission Products are included under this Privacy Policy: Ethernet VPN; IP Connect; IP Peering/Transit; Mast Rental.

In this Privacy Policy, we describe matters pertaining to our processing, use and disclosure of personal data in this connection.

Types of data and purpose

In connection with the delivery of Transmission Products, the following personal data are collected, verified or processed in our internal systems:

- Address
- LID/circuit
- Any email address of a contact person at the service provider.

The purposes for which we collect and process data are:

- Personal data are collected in connection with general operation of systems connected with IT infrastructure which allows the delivery of the above product varieties.

Type of processing of personal data:

- The customer's data are processed in connection with the delivery of the above product varieties and to ensure correct functionality and, if necessary, to perform fault repair on the underlying IT systems.

Automated individual decision-making • Personal data are not processed for automated individual decision-making or profiling.

Legal basis for collecting and processing personal data

- The legal basis for our collection and processing of personal data in connection with the use of Transmission Products is a contractual obligation and a legal obligation.

37

Disclosure of your personal data

- In connection with your product, Transmission Products, TDC Wholesale transfers your personal data for the purpose of providing support for and fault repair on miscellaneous IT systems. This is performed via external partners.

The legal basis for the disclosure of personal data is as follows:

- Contractual obligation to the customer to facilitate the product requested or purchased by the customer.

Transfer of personal data to recipients in countries outside the EU/EEA

We transfer your personal data to the following recipients in countries outside the EU/EEA:

- In connection with the provision of support on miscellaneous internal IT systems in TDC Wholesale, access to your personal data is granted to an external firm of IT consultants in India. The data are only processed for as long as the support is provided. The basis for the international transfer is to enable us to provide the necessary IT support.

Storage period

We store your personal data for as long as this is necessary to meet the above purposes. Furthermore, reference is made to the general GDPR guidelines and to both the Danish Bookkeeping Act (*Bogføringsloven*) and the Danish Logging Act (*Logningsloven*).

Data processing security

To protect and secure your personal data used in this product, we have introduced a number of security measures, which are audited regularly. You can read more about these measures via the links below:

[Danish version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_dk.ashx?la=en

[English version] https://tdcgroup.com/-/media/images/tdccom/privacy/si0003_uk.ashx?la=en

Contact us for further information

If you want further details on the processing of your personal data in connection with the delivery of Transmission Products, please contact us via our Customer Support.