

Corporate Customer Privacy policy for Telia Sverige AB

We are Telia Sverige AB (org. nr 556430-0142), (hereafter ‘Telia’). In this Privacy policy we describe how we, as the controller, process and protect personal data. This privacy policy applies when Telia supplies products and services to a corporate customer (the customer) and where Telia is the controller. The privacy policy also applies for Telia websites for customers in Sweden (e.g. MyBusiness and telia.se) but does not apply to websites or services from other companies, even if it is possible to access them from Telia’s network or services.

This policy describes our processing of personal data about the data subject, that is an employee or consultant of our customer (a “user”). When processing personal data, we comply with the General Data Protection Regulation (GDPR), the Data Protection Act 2018:218¹, The Electronic Communications Act 2022:482² and other directly applicable legal acts regulating the processing of personal data.

Telia's processing of personal data on behalf of the customer is not subject to this privacy policy.

1. What is in this Privacy policy?

This Privacy policy applies to the processing of personal data in a B2B context. In addition, Telia may have service-specific privacy policies, which describe the processing of personal data in the context of a specific service. These can be found along with the specific services that we provide.

This Privacy policy sets out:

- how we collect personal data,
- what personal data we process,
- how we protect and safeguard personal data,
- to whom we disclose personal data,

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

2. How do we collect personal data

Telia offers a wide range of services. We for example collect and process data that the customer provides when the customer enters into a contract with Telia and communicates with us – e.g. by contacting us for information or subscribing to newsletters. We also collect and process data that s created when the user uses certain of our services – e.g. by making a call or sending a text message or email.

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

¹ Lagen (2018:218) med kompletterande bestämmelser till EU:s dataskyddsförordning.

² Lagen (2022:482) om elektronisk kommunikation.

Company information

Telia Sverige AB
Stjärntorget 1, 169 94 Solna, Sweden
Registered office: Stockholm
Business ID 556430-0142, VAT No. SE556430014201

Directly from customer

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

Generated data

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

Derived data

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

Other data

This data is obtained from other service providers, public authorities, or publicly available registers, such as SPAR, banks, or credit bureaus (for credit-check and solvency assessment). We also process personal data received from other Telia Company companies in accordance with applicable laws.

3. What Personal data do we process?

Personal data is data that is directly or indirectly linked to an individual.

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

Anonymous data

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

Basic personal data

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

Children's personal data

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

Content of communication

Content of communication refers to information exchanged between two communicating parties using an electronic communications service, e.g., the content of phone calls and emails, SMS and MMS content. Telia is not the controller for the content of communication as we only convey the content through our networks.



Device tracking data

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

Location data

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

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

Special categories of personal data

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

We do not retain or collect such data, unless this information voluntarily have been provided to us with an explicit consent to process such personal data in which case you will be informed about the processing activities performed in more detail upon providing consent.

Traffic data

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

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

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

We collect and process personal data to the extent that it is needed for specified and legitimate purposes and only if necessary to fulfil the purpose. We process personal data for as long as necessary and no longer than needed, taking into account the maximum retention time specified by us or lay down in law.

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

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

More information about the legal grounds, retention times and which rights you have can be found in our Common Privacy Policy which can be found on [telia.se/integritet](https://www.telia.se/integritet).



5. How do we safeguard personal data?

5.1. How we safeguard data

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

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

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

5.2. Protecting children

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

6. To whom do we disclose personal data?

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

- **Telia Companies**

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

If a data subject has not objected to the processing of customer data for marketing purposes, the overall picture of their involvement with Telia companies is used for personalized communication and marketing to them.

If a data subject has agreed to the use of traffic data for the improvement of services and networks and/or marketing, that information is used when we prepare offers to them.

- **Our partners working for us**

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

- **Other telecommunication companies or service providers**



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

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

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

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

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

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

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

- **Other third parties**

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

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

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

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



7. Third country transfers

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

Telia assesses risk factors related to the transfer of personal data to third countries by conducting a transfer impact assessment (TIA). Telia uses TIAs to verify, on a case-by-case basis, whether the law of the third country ensures adequate protection of personal data when transferred. A TIA is also conducted when there is no transfer of personal data to a third country, i.e., outside of the EEA, if personal data is processed by an EEA registered company owned by a non-EEA parent company, or a non-EEA company. By conducting a TIA, we can identify whether an essentially equivalent level of protection as provided in the EEA countries is afforded. We collaborate with our sub-processors to gather sufficient information to perform and complete TIAs. Based on the law or practices of the third country and the effectiveness of the appropriate safeguards we review whether and which supplementary measures should be implemented. In determining which supplementary measures are most appropriate, we assess the effectiveness of such measures in the context of the transfer or other applicable scenario, the third country law and practices and the transfer tool used.

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

The European Commission's standard contractual clauses can be found [here](#).

The Swedish Data Protection Agency's webpage on international transfers can be found [here](#).

8. Your privacy choices and rights

Your rights and options depend on the purposes of the processing and on the situation. You can exercise all the in the Common Privacy Notice mentioned rights by contacting Telia and verifying your identity in any convenient manner. Once identified, we will promptly register and process the request. We will provide information on the action taken no later than within one month of receipt of the request.

You can exercise your rights by writing to:

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

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

Contact information to IMY:

Phone number: +46 (0)8 657 61 00

Email: imy@imy.se

Postal address: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm, Sweden.



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

Our Data Protection Officer can be reached via email at [dpo-se \(a\) teliacompany.com](mailto:dpo-se@teliacompany.com).

9. Changes to this Privacy policy

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

