

TELE2 PRIVACY POLICY

– WE CARE ABOUT YOUR PRIVACY

Applies from 27/04/2021

Tele2 Sverige AB (hereinafter "Tele2") respects your privacy and ensures that you feel comfortable about how your personal data is processed by us.

Below you will find information about what data about you Tele2 processes, for what purpose, the legal basis for the processing, how long the data is stored and your rights, etc.

The types of data we process and how we collect it

We want to offer, develop and improve our services and products and create really attractive offers for you. To do this, we process your personal data (customer data and traffic data). Below you will find explanations about these categories. However, you are not obliged to provide your data to us, but if you do not, it is not certain that we can offer you all our services and products.

Customer data: is information about you as a person and your services e.g. which services you use, your name and personal identity number, your address and email address, your telephone number, your IP address, your user ID, your payment information, demographic data and other information that you provide in your contacts with us.

Traffic data is information about how, when, to whom and from where you use your service e.g. when you begin and end a call, when you send a text message or information about your surfing consumption.

We collect data in a variety of ways:

- Through your contacts with us e.g. when you become a customer with us or if you are in contact with our customer service.
- By you using any of our services or products e.g. when you call or send a text message.
- By obtaining information from our group companies, partners or other external sources e.g. private or public personal records or credit information.
- By using cookies on our websites.

What we use your data for

In order for us to process your personal data, there must be support in the current legislation, there must be a legal basis for the processing. In order for our processing of your personal data to be legal, it is required that it is necessary

- in order to fulfil the agreement with you, or
- in order for Tele2 to fulfil a legal obligation.

The processing of your personal data may also be done

- after a balance of interests, where Tele2's interest in performing the data processing is weighed against your interest in privacy protection, or
- after you have given consent to the processing. Consent is given separately and you can always revoke it by contacting customer service.

In order to be able to provide services and products to you, we need to process your personal data. Below you will find information about the purposes

for which we process your personal data, what legal basis is supported and for how long we store the data. How long we store your personal data for varies depending on what the data is needed for. We never store data for longer than we need it for the relevant purpose.

Provide and fulfil agreement on services and products

We process customer data and traffic data in order to provide services and products to you, fulfil agreements and safeguard our rights under the agreement. For example, we need to be able to identify you as a customer, manage your orders, process your invoices and payments for the service and/or product, obtain credit information, maintain records, troubleshoot and remedy faults, handle comments and complaints about services and products and ensure that network traffic reaches the intended recipient.

Legal basis: fulfilment of agreement, legal obligation

For customers who have a play service

In order to provide our play service to you correctly, including monitoring so that the service functions and supports you when needed, we need to collect, store, use and otherwise process certain information about you and your device. For this purpose we for example process the following data

- data about your device for example in the form of name, model, operating system and resolution,
- your customer number, and
- certain user data, for example which TV categories and/or content you wish to watch and if you pause or rewind programmes.

Legal basis: fulfilment of agreement

The processing described above is a part of the described service and is therefore a condition of our provision of the service. If we cannot perform such processing, we cannot provide the service but your payment obligation remains during the term of the agreement.

Develop and improve our services and products

We process customer data, such as making selections and conducting customer surveys, in order to develop and improve our business, our services and products that we can offer you as well as our processes and methods.

Legal basis: legitimate interest.

Provide and improve service to our customers

We process your customer data and traffic data, when for example we manage your case history, provide customer service, provide our self-service, and continuously train our employees and improve our working methods so as to always offer you the best possible service. We can also provide you

with information about maintenance, service and updates so that your services function as well as possible. When you contact us, the communication may be analysed.

Legal basis: fulfilment of agreement, balancing of interests (Tele2 has a legitimate interest in being able to maintain good customer service).

Direct marketing

We process customer data, for example by analysing and processing statistics, in order to be able to offer you relevant offers regarding our own and our partners' products and services. We process traffic data, by collecting, storing, preparing and analysing, for example analysing how exactly you use our services and products, in order to be able to tailor offers that suit you. Marketing takes place via e.g. letter, telephone, text message, Internet and email.

Legal basis: legitimate interest (customer data) and consent (traffic data).

Information security and to prevent misuse of services and products

We process customer data and traffic data in order to safeguard the security of all our services, products and electronic communications, to detect or prevent unauthorised use of the service or product and/or to detect and prevent fraud, virus attacks, etc.

Legal basis: balancing of interests (Tele2 has a legitimate interest in maintaining the security of our services and networks) and legal obligation.

Fulfil obligation according to the law or other statute, government authority regulation, decision, request or guidelines and to be able to safeguard our interests.

We process your customer data and traffic data in order to fulfil our obligations according to the law or other statute, government authority regulation, decision, request or guidelines, for example we store data in accordance with the Book-keeping Act and the Electronic Communications Act.

Legal basis: legal obligation.

How long we store your data for

As a general rule, we store your customer data for the purposes we specified above as long as you are a customer with us and for up to 24 months thereafter. We store your traffic data for up to 12 months after the data was created. But we may also store this data longer for certain purposes such as:

- invoicing and payment purposes, as part of the book-keeping documentation or in order to safeguard our interests, we store data for up to 10 years after the documentation was created or for as long as a possible dispute is in progress.
- for direct marketing purposes, we store customer data for 24 months after the contractual relationship has ended.

- to be able to analyse exactly how you use our services and products and to tailor offers that suit you, we store your traffic information for as long as we have valid consent from you and no later than 24 months after your traffic data was collected.
- to be able to provide and improve our service to you, we store customer data for 24 months after the contractual relationship has ended. Recorded calls and chat communication may be stored for a maximum of 90 days.
- to fulfil an obligation according to the law or other statute, government authority regulation, decision, request or guidelines, we store customer data and traffic data for as long as is specified in the law.

Cookies

Tele2 uses cookies on our websites, read more in our cookie policy (in Swedish), <https://www.tele2.se/support/din-sakerhet/cookies>.

What is a cookie?

A cookie is a small text file which is saved on your computer by the website you visit.

Cookies make it possible to for example:

- create personalised offers
- obtain information about how visitors interact with the website
- remember what is in the shopping cart
- enable various services and functions

You can find further information about cookies on our website, www.tele2.se or on the Swedish Post and Telecom Authority's website, www.pts.se.

To whom we disclose your information

To companies in our group and subcontractors or other assistance.

As we have certain group-wide functions, your personal data may be disclosed to other companies within the group for the purposes described above. Such companies may for example process your data with the aim of providing offers and other marketing products and services that may interest you. In some cases, we also hire subcontractors or other assistants to, for example, be able to deliver our services and products. This means that they also need certain information about you as a customer. However, these subcontractors or other assistants may not use your personal data for purposes other than those we specify.

If your housing association or property owner has a group agreement with us and you have ordered a service and used the group discount, we may disclose data that you have ordered a service covered by the group agreement to your housing association or property owner.

Transfer of personal data to third countries

We also hire certain providers and suppliers who have their operations outside the EU/EEA, in a so-called third country, in order to be able to provide services and products to you. If we transfer your personal data to a third country for this purpose, we check that there is either an adequate level of protection in that country or that there are special guarantees that the data and your rights are protected. Sufficient guarantees may be that the transfer is regulated by special contractual clauses that protect your rights or by binding internal company rules.

You can find more information in Swedish about the transfer of personal data to third countries at <https://www.imy.se/lagar--regler/dataskyddsfordordningen/tredjelandsoverforing/>

To other operators or service providers

When you call a recipient in another operator's network, for example during international calls, in order for us to provide the service, certain data may need to be provided to that operator. In order to perform deliveries, provide optional services, communicate with you, and provide relevant offers, certain data may be disclosed to service providers, distributors and other partners who provide related products and services. Such recipients process your personal data as independent personal data controllers.

Directory services

In Sweden, there are a number of lists of subscribers (such as directory services in the 118 series) and there is a public interest in these continuing to exist.

You have the option to decide whether your personal data will be included in lists of subscribers. This means that Tele2 discloses your details (name, address and telephone number) to others for directory services purposes if you do not request that your number be kept secret. You can request a secret number from us at any time and the details will not then be forwarded. In that case, please contact customer service.

Other recipients

We also provide information where we are required by law or government authority decision to disclose information e.g. to the emergency services and law enforcement agencies, or upon special request in very special cases, such as pandemics.

We may also disclose your data in connection with company acquisitions.

Your rights

In accordance with applicable legislation, you have a number of rights which means that you can obtain information about and have control of your personal data.

Here we list your rights and at the end of the document you can find the contact details of Tele2 which you can use if you would like to apply your rights.

You normally have the right to exercise your rights below free of charge. However, if the request is manifestly unfounded or unreasonable, we may either charge a reasonable fee or choose not to comply with the request.

We will respond to a request from you without unnecessary delay and normally within one month. Should additional time be required or if for any reason we are unable to accommodate your request, we will inform you of this. We may also request additional information from you if it is required for us to confirm your identity and ensure that it is you and no-one else is trying to gain access to or control your personal data.

Right to information and access to your personal data

You have the right to request a confirmation that we process personal data about you and, if this is the case, we will inform you about how your personal data is processed. You also have the

right to receive a copy of the data that we process (through an extraction of the records). If you request additional copies we have the right to make a reasonable charge for this.

Right to rectification

It is important to us that the personal data that we have about you is correct. If the data is incorrect, you have the right to contact us and request to have the data corrected. You also have the right to request that data is added if any is missing, if the addition is relevant having regard to the purpose of the processing. We will notify them, to those whom we have disclosed your data, that a correction has been made. At your request, we will also inform you of what information about the correction has been disclosed and to whom.

Right to be erased

You have the right to contact us to request that your personal data be erased.

- If the data is no longer needed for the purpose it was collected for;
- If the processing is based solely on your consent and you revoke the consent;
- If the processing takes place for direct marketing and you object to the data being processed;
- If you object to the processing of personal data that takes place after a balance of interests and there are no justifiable reasons that outweigh your interests;
- If the processing of your data has not complied with applicable law; or
- If erasure is required to fulfil a legal obligation.

However, in some cases we cannot accommodate a request for erasure e.g. if we are required by law to store the data. If erasure occurs, we will notify those to whom we have disclosed your data that erasure has taken place. At your request, we will also inform you of what information about erasure has been disclosed and to whom.

Right to make objections

- You also have the right to any time to object to your data being used for direct marketing. You do this by contacting us at Tele2. If you make such an objection, we will no longer process the data for that purpose;
- You also have the right to object to us processing your data on the basis of a balance of interests. If we cannot show that there are compelling justified reasons for the processing that outweigh your reasons, the processing must cease.

Right to restriction of processing

You have the right to contact us and request that the processing of your personal data be restricted and that the data should then only be stored by us in the following situations:

- During the time it takes us to check whether the personal data is correct, if you dispute the accuracy of the personal data;
- If the processing is illegal and you object to the data being erased and instead want us to restrict the use of it;
- Even if we no longer need the data, if you want us to keep it so that you can use it to establish, assert or defend legal claims; or
- Pending verification of whose legitimate reasons, yours or ours, weigh most heavily if you have objected to the processing.

However, in some cases we cannot accommodate a request for restriction e.g. if the data is necessary for us to be able to defend our rights or protect

another person's rights. If restriction occurs, we will notify those to whom we have disclosed your data that restriction has occurred. At your request, we will also inform you of what information about restriction has been disclosed and to whom.

Right to data portability

You have the right to request access to your personal data in a machine-readable format and have the right to use such personal data elsewhere e.g. when you choose to take your telephone number with you to another operator. This right applies to such personal data that you have provided to us and which is processed with the support of your consent or if the processing is based on an agreement with us.

Contact details for Tele2 and our data protection officer

If you have any questions or wish to exercise your rights e.g. revoke your consent

- Log in at Mitt Tele2.
- contact our customer service for the brand Tele2 via chat or phone: +46 (0)772-25 25 25.

If you do not want to have our direct marketing

You always have the right to opt out from receiving our direct marketing of services and products made via text message, email, telemarketing, by post or via our partners' websites.

Simply call our customer service or click on unsubscribe in the text message or email message. You can also unsubscribe by letter to the address below. Please state your name, personal identity number and which subscription applies.

Tele2 Sverige AB, Box 62, SE-164 94 Kista, Sweden

If you do not wish to participate in our customer surveys

You always have the right to opt out of participating in customer surveys. Simply call our customer service. You can also unsubscribe by letter to the address below. Please state your name, telephone number and which subscription applies.

Tele2 Sverige AB, Box 62, SE-164 94 Kista, Sweden

Complaints

If you believe that your personal data is being processed in violation of applicable law, you can submit a complaint directly to us or to the Swedish Authority for Privacy Protection.

Data protection controller Tele2 Sverige AB

Tele2 Sverige AB is controller for the processing of our customers' (consumers') personal data which is carried out for the brand Tele2. As personal data controller we decide the purpose and the means of processing.

Data protection officer Tele2 Sverige AB

Our data protection officer monitors us to ensure that we comply with current legislation and process your personal data correctly. If you would like to contact our data protection officer, you can call our customer service for Tele2 on telephone number 90 222 or email dposweden@tele2.com.

Changes to the privacy policy

Tele2 may change this privacy policy. Major changes will be communicated to you in an appropriate manner and in good time before the change becomes effective. We will also notify you of any changes on our website www.tele2.se. We will also keep all versions of the policy available for you there.

