

# PRIVACY POLICY OF TELIA SMART WIFI SERVICE



Valid from 29 May 2023

This Privacy Policy describes how personal data is processed in the Telia Smart Wifi Service (hereinafter referred to as "the Service"). In addition to this, the [Privacy Notice](#) of Telia Estonia AS will apply.

Smart Wifi is a service that helps you improve the speed, connectivity and stability of your wireless home network (wifi). The service is provided through additional equipment delivered to customers and an application downloadable onto a smartphone. Furthermore, the service introduces various extra features for managing a home network and enables better customer service should there be any problems with the service.

The service settings are managed with the Telia Smart Control Application. Application requires either an Android or an iOS smartphone. The application allows you to check the status of your wireless home network and the devices that have been connected to it.

## 1. How do we collect your personal data?

When you use the Service, we will process data about you collected from the following sources:

- Directly from you when you register or log into the Service or use the Service.
- Detected data generated in connection with the Service use, including device information, home network equipment and Wifi performance.
- Derived data we have created based on, your personal data and patterns, such as conclusions about your possible interests, made by means of analytics.

It is voluntary to disclose personal data to Telia. It is however not possible to deliver the Service without personal data. The deployment and use of the Service requires the disclosure of certain personal data in able to function.

## 2. What data do we process about you?

The information collected and processed by the Service helps Telia to deliver the best possible Wifi experience for Telia's customers. The Service processes only information about the Wifi network itself and its technical performance.

In order to provide the Service, we will process the following information about you:

- Personal data and credit data for completing an order;
- Address for delivering the equipment;
- The customer's name, entered upon registration;
- Messages, comments and reactions on the feedback board;
- Log-in information; and
- Family or families that the customer has joined and the name of the family.

In order to provide the Service, we will also process the following information related to the Service:

- Device information (serial number + MAC and IP address + device name) for establishing connections between base stations.
- For each mesh node and connected client device: consumed data for download and upload, signal strength, link speed (how fast the connection is between the client device and mesh node).
- Mesh network information: technical parameters describing how well Telia customer's local Wifi network (mesh network) is performing. Data includes, for example, bandwidth and channel utilization, link speeds between mesh nodes and interference in Wifi network.
- Network settings: Wifi network (SSID name, guest network). For security reasons, Wifi password is never shared unencrypted but only locally on customer's equipment.
- Warnings and alarms related to Wifi network performance to help user to solve the possible problems in their Wifi network.

Telia will only process customer data pertaining to the Smart Wifi service or its use when providing the service; or, for example, if a customer is experiencing a problem or a fault and has contacted the customer service department and given permission and the necessary information to form a connection. In that case we may also use information about the customer's Smart Wifi service home network and the devices connected to it.

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Telia processes children's personal data to the extent permitted by law, when appropriate in the case in question. 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, taking into account the available technology and the privacy risks related to the processing.

### 3. For which purposes does Telia process customer data?

Telia processes personal data in order to provide the Service under the agreement. Data is processed to e.g., provide customer with information about how they can enhance the quality of their Wi-Fi service, manage client devices as well as this information is processed and provided to the Telia customer via the Smart Control Application.

In all of the below cases, we only process data necessary for the purpose of the processing and taking privacy into account. Telia will only use your data for the purpose for which it was collected.

#### **On the basis of a contractual relationship and in order to provide the Service**

Telia processes your personal data for the provision of the Service in the following situations, for example:

- Delivery and provision of the Service in accordance with your agreement with Telia
- Problem-solving, e.g., repairing any faults of the Service.

#### **On the basis of legitimate interest**

Telia processes personal data on the basis of a legitimate interest, for example in the following situations:

- Customer service, e.g., general customer service in relation to services and products and for the provision of better services and products.
- Service development, e.g., analysing the use of the Service in order to understand customer needs and develop the Service as well as other services and products.

#### **For other purposes to which you have given your consent**

Telia processes your personal data for all purposes to which you have given your consent.

When requesting your consent, we inform you of the meaning of the consent to data processing and how you can withdraw your consent.

### 4. How do we protect and safeguard your data?

Protection of your personal data is of paramount importance to us.

Telia continuously works to protect the interests of its customers. Our security efforts take into account the risk level, goodwill, available technology, vulnerabilities and threats in accordance with legislation, regulations and contractual obligations.

### 5. To whom do we disclose your data?

We disclose your personal data to the extent permitted and required by law.

We transfer or disclose your personal data to the parties below.

**Other companies belonging to Telia Company** within the scope of law. Our Group companies use your personal data for the purposes stated in this document.

**Our subcontractors, i.e., processors of personal data** who process personal data on behalf of Telia. These processors include both subcontractors from whom Telia has purchased data processing services and subcontractors related to the provision of the Service, e.g., support and analysis service providers. These third parties are not allowed to use the personal data for any other purpose than for providing the service agreed with Telia. We take appropriate measures to ensure that the subcontractors comply with this Privacy Policy.

Our partners who process personal data on our behalf are located outside the European Union/ the European Economic Area. When transferring personal data outside the EU or EEA, we follow the requirements set out by law. In addition, we ensure, and expect our processors to ensure, as required by legislation, that your personal data remain protected regardless of whether they are transferred outside the EU or EEA.

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We also disclose your data:

- **Due to legal action or following a request from an authority**, in accordance with a legal or court decision, or in relation to legal action or other legal proceedings.
- **To competent authorities**, if required or permitted by law and in accordance with predefined processes.
- **In connection with** a transfer of business, such as merger, acquisition, sale of assets or transfer of services to another company.

We also process anonymized data that cannot be associated with you as a person. Such information can also be disclosed to third parties for purposes other than those described in this Privacy Policy or Telia's Privacy Notice.

## 6. How long do we store your personal data?

We store data created and processed during the use of the Service for 28 days for the purposes specified in this Privacy Policy. Similar restrictions do not apply to the storing of anonymised data.

Other data than described above that is processed on the basis of a contractual relationship or legitimate interest will be stored during the period of your contract and two years thereafter.

## 7. What rights and options do you have?

Your rights as a data subject depend on the purposes of the processing of personal data and on the situation.

- **The right to object to the processing of personal data:** You are entitled to object to the processing of your personal data based on Telia's legitimate interests. Your data is erased when your request related to the objection has been processed and approved. Telia may reject the request, if the processing is necessary in order to implement Telia's mandatory and legitimate interests. You are always entitled to oppose to the processing of your personal data for direct marketing purposes and for profiling related to direct marketing.
- **The right to give and withdraw your consent:** If the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time.
- **The right of access:** You have the right to receive a confirmation of whether your personal data are processed, and if they are, to gain access to the data.
- **The right to be forgotten:** You have the right to have your personal data erased, e.g., when you withdraw your consent or have objected to the processing of personal data based on a legitimate interest and your request has been accepted. If you wish to stop using the application and delete your personal data, you may submit a request to us, and we will delete the data after processing your request.
- **The right to rectify data:** You are entitled to have your personal data rectified or, in certain cases, to have defective personal data supplemented.
- **The right to restriction of processing:** You have the right under certain circumstances to require that Telia restricts the processing of your personal data.
- **The right to data portability:** You have the right to receive your personal data you have submitted to us for processing based on your consent or the performance of a contract. You are entitled to receive the data in a structured, commonly used and machine-readable format, and the right to transfer the data to another controller.

## 8. How can you exercise your rights and contact us?

You can exercise your rights either via the application or by contacting us using the following contact information:

### Data Controller

#### Telia Eesti AS

Mustamäe tee 3, 15033 Tallinn

Registry code 10234957

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National switchboard: 123 (+372 639 7130 when calling from abroad)

Customer service's phone number: 123

If you suspect that Telia has not complied with this Privacy Policy or applicable data protection legislation, we hope that you inform us about it first. It is our intent that we will manage to sort out any concerns which you may have together. If you still feel unhappy, please be advised that you have the right to file a complaint with the [Data Protection Authority](#) who monitors the lawfulness of the processing of personal data in Estonia.

Telia is committed to responsible and sustainable business operations. If you suspect that Telia has failed to comply with the law or its Privacy Notice, you can submit a confidential notification via [Telia Company's Speak Up Line](#) (a so-called whistleblowing system).

If you have questions or would like to talk about the steps that Telia Company is taking to guarantee your data security, please contact our data protection officer at [privacy@telia.ee](mailto:privacy@telia.ee).

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

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

## 9. Changes to the Privacy Policy

The development of our operations, services and products may require changes to this Privacy Policy. You can find the latest version on our website and in the Telia Smart Control Application. We will notify you of any significant changes through the application and by posting an updated Privacy Policy on our website.