

TELE2 GROUP PRIVACY Q&A

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Why does Tele2 process personal data?

Tele2 processes personal data to be able to deliver the services that customers purchase. For example, Tele2 and the customer sign a contract to agree on the service that is being delivered. That contract contains personal information. Another example is billing, for which Tele2 needs to process payment information.

To connect your calls, deliver messages, etc., Tele2 needs to process traffic data to make sure your call is connected and that messages are delivered, and to the right person. Personal data may also be processed for network integrity and safety, and to combat fraud.

Tele2 also process personal data to fulfill legal requirements, e.g. for book-keeping and legal intercept by investigative authorities.

How does Tele2 get consent for processing personal data?

Tele2 collects consent for processing data when the customer sign or enters into the contract, e.g. in a store or online. A customer may at any time withdraw their consent.

What can Tele2 do with my personal information?

Tele2 will only use your personal data for the purpose for which it was collected. This purpose is clearly communicated to the customer at the time of signing the contract for the service and can also be found in the relevant local privacy policies.

How do Tele2 services take customer privacy into account?

We need to use personal data in many of our services to deliver them to the customer. Hence, protecting the integrity of personal data, and safeguarding that data spread across systems, devices and the cloud, is a key priority for us. Therefore, every project within Tele2 is required to include a privacy impact assessment. This way, privacy is considered in an early stage of development of a service. Furthermore, we have the necessary organizational measures and processes in place to further warrant data protection (see below)

Which Tele2 employees can access personal data?

Only employees that are granted the necessary credentials can access personal data through our access management systems. Credentials are only granted on a necessity basis.

How does Tele2 ensure its employees follow the rules?

We engage employees by making relevant information available to them through training. This training is mandatory for permanent and temporary employees, and for (external) contract workers such as consultants. Tele2 expanded the training by launching a data protection awareness movie in 2017. The movie provides insight to employees into privacy and data protection, why it matters and how it affects their work. This movie is available in all languages of the areas where Tele2 operates. Employees are required to view the movie as part of their continued training.

Respecting customer privacy and integrity is included in the Tele2 Code of Conduct, which is read and signed by Tele2 employees when they join the company, and thereafter on an annual basis. Furthermore, Tele2 has processes and systems in place that prevent from unauthorized access to personal data.

How does Tele2 ensure that personal data is kept safe?

Data protection is a top-10 key process within Tele2. That means that it is considered in all areas of our organization.

Tele2 has a mature approach to protecting the customer's privacy and their data:

1. We have an established network security organization and necessary processes in place to protect against, monitor and react to internal and external cyber security threats.
2. We have a 24/7 Security Operations Center (SOC)
3. We have a 24/7 Security Incident Response Team (CSIRT)
4. We have structured access management control, including two factor authentication, for accessing personal data
5. We review and update malware protection and security patching on a continuous basis.
6. We have a Governance, Risk and Compliance tool to ensure that we do risk assessment, we follow up on security measures and we escalate any potential deviations
7. We have a log platform in which the major systems containing personal data are included
8. We have an ongoing process to ensure proper security awareness among employees and partners, including continuous training modules for all employees
9. We hold internal and external audits on cyber security and information security management, of ourselves and our most important IT suppliers that process personal data.

How long will my data be kept by Tele2?

Personal data will only be stored for as long as necessary for the purpose that it was collected. For more information please refer to the local Tele2 webpages.

How can I review or change the data that Tele2 has collected on me?

Customers can always contact their customer service or their local Tele2 Data Protection Officer to find out what data Tele2 processes, and to request corrections or withdraw consent.

Does Tele2 make information available to third parties?

Tele2 may use business partners to deliver its services to customers. Under a special agreement, the relevant business partner may access personal data, but that is strictly limited to the purpose of delivering the service agreed with the customer. Business partners are held to the Tele2 Business Partner Code of Conduct, which contains a commitment to privacy and data protection.

Tele2's privacy policy does not allow it to make personal data available to other third parties, unless the customer has consented to that via an opt-in mechanism.