

## TELIA SMART FAMILY PRIVACY POLICY

26 August 2020

This Privacy Policy describes the processing of personal data in the Telia Smart Family service. In addition to this policy, the [Privacy Notice](#) of Telia Finland Oy shall apply to the processing of personal data where applicable.

This Privacy Policy applies to all parts of the Telia Smart Family service (hereinafter referred to as "the Service" or "the Services"). The Services are provided via an internet connection using an application that works on different mobile devices.

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

When you use our Services, we may process personal data about you collected from the following sources:

1. Directly from you when you register or log into the Service or use the Service or otherwise do business with us. We collect your data in this way when, for example, you register and log into the application or use the application, you are in contact with us, or when you subscribe to our newsletter or participate in a prize draw.
2. Detected data generated in connection with the Service use
3. Derived data we have created on the basis of your personal data, such as conclusions about your possible interests, made by means of analytics in order to target direct marketing.
4. Data obtained specifically from other sources, such as other service providers or publicly available registers, such as the Population Register Centre, Posti's registers, the Robinson register of the Data & Marketing Association of Finland (ASML), Suomen Asiakastieto, Fonecta, Aller and Futusome.

You do not need to disclose your personal data to Telia, but it may not be possible to deliver all the Services without personal data. The deployment and use of the Service requires the disclosure of certain personal data.

### 2. What personal data do we process on you?

We may process the following personal data:

- User's name and phone number, entered upon registration
- User's profile picture
- Location data, through GPS positioning:
  - Home (GPS positioning coordinates), set by the user in the application
  - User (GPS location data obtained from the phone)
  - Timestamp for arriving at a specified location or leaving the location
- Messages, comments and reactions on the message board
- Log information
- Family or families that the user has joined and the name of the family
- Data describing the use of the Service, including any personal data collected by means of cookies and similar technologies in connection with web or mobile browsing
- Data collected in connection with registration for events, competitions and prize draws organized by Telia.
- Data related to direct marketing campaigns, permissions and prohibitions related to direct marketing, interests, subscriptions to newsletters and invitations to events, data related to the targeting of direct marketing
- Other data that we collect with your consent and that we specify when requesting your consent.

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. Structure and main features of Telia Smart Family

Telia Smart Family is a service created for families to make everyday life easier and more carefree

The application will notify you when family members arrive or leave your home. This means that parents do not need to worry about when their children come home, for example. The application also provides a convenient place for family communication, acting as the family's own message board.

To activate and use the app, you must register as a user and provide your phone number. We process the application usage data on a number-specific basis

*Who sees the messages, comments and reactions posted on the family board?*

- Only family members and other members added to the family in the application can see the messages, comments, and reactions posted on the board. Telia does not process communications data for purposes other than those necessary for the provision of the Service.

#### Company information

Telia Finland Oy  
Pasilan asema-aukio 1  
FI-00510 HELSINKI, Finland  
Domicile: Helsinki  
Business ID 1475607-9, VAT No. FI14756079

*How do I create or join a family?*

- Each user can create several families or be invited to join another family. The family main user can invite and remove members from the family.

*Are messages and communication encrypted?*

- Yes, all messages and communication are encrypted.

*Can I delete sent messages?*

- Yes, you can choose to delete the messages, comments, and reactions you have sent. Main users can also delete other users' messages, comments and reactions.

*What is the phone's location data used for?*

- You can set a GPS location for your home in the application. When a user arrives at or leaves this location according to the GPS location obtained from their terminal device, the application notifies other users connected to the family of this. The location data from the device is used to determine whether or not the user is at this location. The phone compares the home GPS location saved in the application by the user to the GPS location of the phone, and the comparison is made in the phone. A timestamp is also saved of the comparison. Only members added to the family can see which family member is at home or away from home. No other information about the user's location is shared or processed.

#### **4. For what purposes do we process your personal data?**

Telia processes personal data related to Telia Smart Family mainly on the basis of the performance of a contract and legitimate interest.

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

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

- Customer relationship management, e.g. management of the customer relationship based on a contract between Telia companies and the customer.
- Delivery of products and services, e.g. the provision and delivery of services in accordance with your agreement with Telia and customer service related to the Service.
- Problem-solving and troubleshooting, e.g. repairing any faults or defects in the service and ensuring the quality of the Telia Smart Family service.
- Service delivery, e.g. the provision and delivery of services in accordance with your agreement with Telia and the provision of online content services.

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

Telia has the right to process your personal data on the basis of a legitimate interest, for example in the following situations:

- Customer service, e.g. general customer service for Telia Smart Family services and products and the provision of better services and products
- Service development, e.g. analysing the use of the application in order to understand customer needs and develop the Telia Smart Family services and products

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

Telia may process your personal data for all purposes to which you have given your consent. You can give your consent for the following purposes, for example:

- your image is shown in your application profile view to other users in the same family;
- we can send you electronic direct marketing;
- the Telia Smart Family application can send you push-notifications about new messages from family members or their arrival at home, for example;
- the location data available from the device is used, for example, to report the arrival or departure from home or some other specified location;
- the Telia Smart Family application retrieves the details of the person stored in your phone contacts that you want to add to your family; and
- the Telia Smart Family application can access the camera and photos on your phone to allow you to add photos to your family board.

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



Telia may also combine and otherwise process your personal data in a form in which it can no longer be associated with you as a person.

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

## 5. How do we protect and safeguard your personal data?

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

Telia continuously works to protect the interests of its customers. Data security at Telia includes protecting our personnel, data, IT infrastructure, internal and public networks as well as premises and technical facilities. We pay particular attention to the protection of personal data.

Data security and the appropriate protection of customer data are a key concern for us. We strive to implement security measures to ensure an appropriate level of data protection and to detect and prevent the unauthorised use of personal data.

Our security efforts take into account the risk level, goodwill, available technology, vulnerabilities and threats in accordance with legislation, regulations and contractual obligations.

## 6. To whom do we disclose your personal data?

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

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

**Other companies belonging to Telia Company** within the scope of law. Our Group companies may use your data for the purposes stated in this document, such as for marketing their products and services.

**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 Telia Smart Family services, 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 may be located outside Finland, the European Union or the European Economic Area. When transferring personal data outside the EU or EEA, we ensure by means of agreements (e.g. by the use of the EU Commission's standard contractual clauses) or otherwise that the transfers are implemented as required by law. In addition, we ensure, and also 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.

This Privacy Policy does not cover the applications, services or websites of other companies, even if they are accessed through Telia's network or services. Personal data is collected and processed in the services of external service providers in accordance with the privacy policies and terms of contract of that service. We recommend that you review the privacy policies of each service provider.

We may 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 may also process anonymized or statistical 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.

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

We keep your personal data only as long as necessary to fulfil the purposes defined in the Privacy Policy, unless otherwise required by legislation. No corresponding restrictions apply to the storing of anonymized data.

We do not store outdated or unnecessary information. We aim to make sure that your personal data and other customer data are up-to-date and correct.

Your data processed on the basis of a contractual relationship will be stored for an indefinite period. 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. You can delete messages, comments, and reactions you send to the message board in the application at any time. The main user can also delete messages, comments, and reactions sent to the message board.

Data processed on the basis of legitimate interest are processed for as long as there are grounds for their processing. If the customer is entitled to object to the processing, the data are erased when the customer's request related to the objection has been processed and approved.



Data processed on the basis of legal obligations are processed and stored as long as required by law.

The storage time of data processed with your consent is determined according to purpose of the processing. Data processed on the basis of consent will be deleted without undue delay if the consent is withdrawn and there has been no other basis for processing the data.

## 8. Use of cookies and similar technologies

For information on the use of cookies and other similar technologies, please refer to our [Cookie Policy](#).

## 9. 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. 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.
- **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 the controller to restrict 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.

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

You can request a report through the application about the data collected about you in the application. You can request the report in the application under Profile > My Name > Request your data. The summary will be provided within 24 hours of the report request and will be available to you for seven days after the completion of the report.

In matters relating to the rights of data subjects, you can email us at [privacy-smartfamily@teliacompany.com](mailto:privacy-smartfamily@teliacompany.com) or contact us by post or telephone using the contact details below. Please specify the relevant phone number associated with Telia Smart Family in your message.

### Data Controller

#### Telia Finland Oyj

Pasilan asema-aukio 1, Helsinki  
P.O. BOX 106, FI-00051 TELIA  
Business ID 1475607-9

Nationwide switchboard number 020401 (from abroad: + 358 20401)  
Customer service and telephone 020 690 400

Data Protection Officer: [tietosuoja-telia@teliacompany.com](mailto:tietosuoja-telia@teliacompany.com)

If you suspect that Telia has not complied with this Privacy Policy or applicable data protection legislation, you may file a complaint with Telia. You can also file a complaint with the Data Protection Ombudsman, who monitors the lawfulness of the processing of personal data in Finland.

## 11. 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 Family application. We will notify you of any significant changes through the application and by posting an updated Privacy Policy on our website.

