

Privacy policy for Telia Play

In Telia Finland (later “Telia”) we recognize that privacy is important to our customers and we are committed to respect and safeguard our customers’ privacy. Our customers trust us with their private information and we are responsible for living up to this trust placed in us every day.

In this Privacy policy we describe how we, as the controller, process and protect your personal data when you are using our Telia Play services.

When processing your personal data, we comply with the Finnish legislation and the mandatory regulations, including General Data Protection Regulation, and instructions issued by the competent authorities.

1. When is this Privacy Policy applicable?

This Privacy Policy is applicable when we provide you with the Telia Play services. The services are offered via the Internet, using a set-top-box or an app on different devices or an Internet browser. Features in the service may vary according to the platform used.

You can read more about how we safeguard your data, with whom we share your data, which rights you have and how you can utilize them in our common Privacy Notice. You can find our common Privacy Notice at <https://www.telia.fi/tietosuoja-ja-tietoturva>.

This Privacy Policy does not apply to the processing of personal data by other companies, for example Netflix or YouTube, when you are using their services or websites, even if they were accessed through our networks or services.

2. How and what personal data do we collect?

Telia collects and further processes your personal data from the following sources when we are offering you the Telia Play services:

Directly from you

This data is derived from you, when you do business with us, buy or subscribe to our services, or when you register with or log in to our services, or contact us requesting information. Some data is provided as a part of the Telia Play service settings, such as contact details or password.

Generated data

This data is generated when you watch content in the Telia Play service, by renting movies or when you browse through the TV user interface. Data generated by usage of Telia Play services consist e.g., of TV viewing data and of information about your interaction with the service user interface e.g., by choosing between functionalities in the interface, clicking visible banners or choosing your settings for the services.

You are not obliged to disclose any personal data to Telia, but please note that if you choose not to disclose your personal data, we will not necessarily be able to provide you with all our services or offer our solutions to you. When you subscribe to the Telia Play service it is necessary that you provide the needed information to enter into and maintain a contract with us.

Telia Play services are not offered to or targeted at children. Therefore, it is the responsibility of the child's parent or guardian to ensure that if a child has access to any Telia TV services it is guided and supervised appropriately.

3. Structure and main features of Telia Play service subscription

We process usage data of the Telia Play set-top-box so that individual users of the household cannot be identified.

Specifically, we process usage data generated via usage of Telia Play Application used through the internet browser, mobile device, or other smart device. It is possible to have several Telia Play accounts for different devices. In case of multiple users for example of a computer and internet browser application, the usage data of possible several users of that computer cannot be separated. In case of multiple users, the usage data of a user of the service cannot be linked back to an individual user. Please note that this means that in case of several users using the same device, for example computer in the household, all users of the service may access to the information visible from the user interface of the Telia Play Application, such as the viewing details for example.

If you have subscribed to services on both set-top-box and app, the usage data are combined to allow the seamless viewing experience when you switch between devices. In this case the usage data of possible several users in a household or of the different devices cannot be separated. In case of multiple users of combined service covering services on both set-top-box and app, the usage data of users cannot be linked back to an individual user. Please note that this means that in case of several users or several application devices using the same combined service in the household, all users of the service may access to the information visible from the user interface of the service, such as the viewing details in the set-top-box user interface for example.

Your Telia Play services may include different functionalities, depending on the platform you use and the age of the set-top-box or the version of your application. Your Telia Play services may have some or all the following functionalities, for which we process your personal data:

- Watched programs, where watched programs are visible on the TV interface.
- Continue watching list to continue watching a program from the spot where you stopped earlier also including rental movies until they are available for you.
- Local news, which is provided to you based on your local area to provide local news.
- My list, your saved favorite movies, or series.

The following features also enrich and personalize your user experience and we process your personal data for:

- Most popular recommendations, which are general recommendations.
- Personalized recommendations 'Recommended for you' and 'Because you watched', which are based on the viewing history created by you via the set-top-box or via an app through an internet browser, mobile device or other smart device.

4. How do we use your personal data and for how long do we process it?

When providing you the Telia Play services, Telia primarily relies on performance of contract and legitimate interest as legal grounds for its processing activities. We will retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Policy

unless a longer retention period is required or permitted by applicable law. The guiding maximum periods for data processing are listed below. However, we may also process your data for a shorter period.

Telia processes your personal data with the legal ground **performance of contract** e.g. for:

- Customer administration: e.g., to administrate your contractual customer relationship with us and across Telia.
- Product and service delivery: e.g., to provide and deliver you the services based on your contract with Telia including providing you personalized TV content recommendations.
- Problem solving and fault detection: e.g., to solve any problems or faults and to ensure the quality of your service in your Telia TV and streaming Service delivery.
- Pre-contractual relationship management: e.g., to fulfil pre-contractual activities, when you e.g., make purchases via the TV interface.
- Service transmission: e.g., to provide and deliver you the services based on your contract with Telia and to provide you the online content service also if you take your service with you, while temporarily travelling within the EU Member States during the duration of your Telia TV and streaming service contract.

We process your personal data for the above-mentioned processing purposes for a **maximum of two years** from the end of the customer relationship, except for the personal data that is processed for Customer Administration purposes and for fault detection and problem solving purposes. For Customer Administration purposes and for fault detection and problem solving purposes we will process your personal data for a **maximum of three years** from the end of the year when the customer relationship has ended.

Telia also processes your personal data with the legal ground **legitimate interest**. Telia has a legitimate interest to process your personal data e.g. for:

- Customer care; e.g. to provide you customer care operations related to Telia TV services and products and to develop better services and products.
- Marketing purpose; e.g. to update, inform you about and to offer you Telia TV products and services.
- Service improvement; e.g. to analyze the TV service usage to better understand our customers' needs and to improve Telia TV and streaming services and products.
- Statistical purposes; e.g. to create TV and streaming services related statistics.
- Customer relationship; e.g. to perform other processing activities to support your customer relationship and to comply with Telia's contractual obligations to our stakeholders.

We process your personal data based on our legitimate interest for a **maximum of two years** from the end of the customer relationship, except for the personal data that is processed and stored for Customer Relationship Support purposes. We process your personal data for Customer Relationship Support purposes for a **maximum of three years** from the end of the year when the customer relationship ended.

In addition, Telia may also transform your personal data into aggregated and anonymized data, where your individual personal data can no longer be distinguished from other's data. In these cases, the outlined retention times do not apply.



In all the above cases, we process any personal information only to the extent necessary for the purpose, always taking into account the protection of your privacy. Your personal data will be used by Telia only in a manner consistent with the purpose for which we obtained it.

5. How to find out about changes to this Privacy Policy?

We may need to update this Privacy Policy as our operations, services and products develop, and therefore we encourage you to check for the latest version of this Privacy Policy regularly on our website. If we make any material changes to this Policy, we will notify you in Telia TV and streaming Service's interface and by providing an up-dated Privacy Policy on our website.

6. How to contact us?

We encourage you to contact us using the contact information provided below for any questions about this Privacy Policy or processing of your personal data.

Telia Finland Oyj
Pasilan asema-aukio 1, Helsinki
PB 106 00051 TELIA
Business ID 1475607-9

National telephone exchange 020401 (Abroad +358 20401)
Data Protection Officer: tietosuoja-telia@teliacompany.com
Phone: 020401 (Abroad +358 20401) and
[Customer service](#) and phone 020 690 400

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