

Data Privacy statement of -T-Mobile HotSpot GmbH („Telekom“) for Inflight Connect App

General

T-Mobile HotSpot GmbH attaches great importance to protecting your personal data. We always inform you what personal data we collect, how your data is used, and how you can influence the process..

Where can I find the information that is important to me?

This **data privacy information** provides an overview of the items which apply to Deutsche Telekom processing your data in this app.

Further information, including information on data protection for specific products, is available at <https://www.telekom.com/en/corporate-responsibility/data-protection-data-security/data-protection> and <https://www.telekom.com/en/deutsche-telekom/privacy-policy-1744>.

Who is responsible for data processing? Who should I contact if I have any queries regarding data privacy at Deutsche Telekom?

T-Mobile HotSpot GmbH acts as the data controller. If you have any queries, please contact our Customer Services department or the Group Data Privacy Officer, Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany datenschutz@telekom.de.

What rights do I have?

You have the right

- a) To request **information** on the categories of personal data concerned, the purpose of the processing, any recipients of the data, the envisaged storage period (Art. 15 GDPR);
- b) To request incorrect or incomplete data is **rectified** or supplemented (Art. 16 GDPR);
- c) To **withdraw** consent at any time with effect for the future (Art. 7 (3) GDPR);
- d) To **object** to the processing of data on the grounds of legitimate interests, for reasons relating to your particular situation (Art 21 (1) GDPR);
- e) To request the **erasure** of data in certain cases under Art. 17 GDPR – especially if the data is no longer necessary in relation to the purposes for which it was collected or is unlawfully processed, or you withdraw your consent according to (c) above or objected according to (d) above;
- f) To demand under certain circumstances the **restriction** of data where erasure is not possible or the erasure obligation is disputed (Art. 18 GDPR);
- g) To **data portability**, i.e. you can receive your data which you provided to us, in a commonly used and machine-readable format, such as CSV and can, where necessary, transmit the data to others (Art. 20 GDPR);
- h) To file a complaint with the competent supervisory authority regarding data processing (for telecommunications contracts: the German Federal Commissioner for Data Protection and Freedom of Information (Bundesbeauftragter für den Datenschutz und die Informationsfreiheit); for any other matters: State Commissioner for Data Protection and Freedom of Information North Rhine-

Westphalia(Landesbeauftragter für den Datenschutz und die Informationsfreiheit Nordrhein-Westfalen)

Who does Deutsche Telekom pass my data on to?

To processors, i.e. companies we engage to process data within the legally defined scope, Art. 28 GDPR (service providers, agents). In this case, Deutsche Telekom also remains responsible for protecting your data. We engage companies particularly in the following areas: IT, sales, marketing, finance, consulting, customer services, HR, logistics, printing.

To cooperation partners who, on their own responsibility, provide services for you or in conjunction with your Deutsche Telekom contract. This is the case if you contract with us services from these partners or if you consent to the incorporation of the partner or if we incorporate the partner on the basis of legal permission.

Owing to legal obligations: In certain cases, we are legally obliged to transfer certain data to the requesting state authority. Example: Upon presentation of a court order, we are obliged under § 101 of the German Copyright Act (Urheberrechtsgesetz – UrhG) to provide the owners of copyrights/ancillary copyrights with information about customers who have allegedly offered copyrighted works via Internet file sharing

Where is my data processed?

In general, your data is processed in Germany and in other European countries.

If your data is also processed in countries outside the European Union (i.e. in third countries) by way of exception, this is done only if you have explicitly given your consent or it is required so we can provide you with services or it is prescribed by law (Art. 49 GDPR). Furthermore, your data is only processed in third countries if certain measures ensure a suitable level of data protection (e.g. EU Commission's adequacy decision or suitable guarantees, Art. 44 ff. GDPR).

What data is recorded, how is it used and how long is it stored?

- **When you use the app in the guest mode, we record the following data :**
 - Type of Base data (voucher customers):
 - first name, last name
 - country of origin (mandatory field)
 - e-mail (mandatory field for invoice and, if necessary, credentials)

We use this data, to facilitate your access to the internet via HotSpot and in case your require feedback regarding outages or refunds, to veri

Session Record Data

In order to invoice the service and to be able to grant refunds, we record the following session data in case of usage:

- username (numeric)
- timestamp (start and end of session)
- type of product
- data consumption

- time elapsed
- payment method
- transaction id
- location of usage / location identifier /Hotspot location (country, provider)

Storage Period of Session Record Data per Flight (voucher customer)

The detailed session records are aggregated after 7 days and are deleted after 90 days

Payment Data (voucher customer)

When purchasing a Hotspot voucher the required payment data is not recorded by T-Mobile Hotspot GmbH. The payment for the offered payment methods is processed by the following companies:

Purchase via Creditcard:

- Payment Service Provider - Computop Wirtschaftsinformatik GmbH, Schwarzenbergstr. 4, D-96050 Bamberg
- Kreditkartenaquirer - Elavon Financial Services Limited, Lyoner Str. 36, 60528 Frankfurt am Main, Germany
- American Express Payment Services Limited, Theodor- Heuss-Allee 112, 60486 Frankfurt am Main, Germany

Purchase via PayPal:

PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

Purchase via Miles and More

Miles & More GmbH, MAC Main Airport Center, Unterschweinstiege 8, 60549 Frankfurt am Main, Germany

Your payment data is recorded directly by the billing services and are not recorded by T-Mobile HotSpot GmbH.

The billing information is only recorded for the purpose of maintaining an error free instructure and for answering billing related question. The billing information is delete after 90 days.

Storage Period of Base Data and Payment Data (voucher customer)

When purchasing a voucher all base data and payment data are deleted after 90 days.

- **When you use the app with a user account, we record the following data**

Type of Base data (voucher customers):

- first name, last name
- country of origin (mandatory field)
- e-mail (mandatory field for invoice and, if necessary, credentials)

We use this data, to facilitate your access to the internet via HotSpot and in case your require feedback regarding outages or refunds, to verify your claim.

Session Record Data

In order to invoice the service and to be able to grant refunds, we record the following session data in case of usage:

- username (numeric)
- timestamp (start and end of session)
- type of product
- data consumption
- time elapsed

- payment method
- transaction id
- location of usage / location identifier /Hotspot location (country, provider)

Storage Period of Session Record Data per Flight (voucher customer)

The detailed session records are aggregated after 7 days and are deleted after 90 days

Payment Data (voucher customer)

When purchasing a Hotspot voucher the required payment data is not recorded by T-Mobile Hotspot GmbH. You can save preferred payment method (credit card or PayPal) and attach it to your user account. By doing so, you will be able to use a 1-click purchase feature. The save preferred payment method is not stored in the app but as a token on the server of Deutsche Telekom AG. The token is accessible for anyone and you can delete your saved payment method anytime.

The payment for the offered payment methods is processed by the following companies:

Purchase via Credit card:

- Payment Service Provider - Computop Wirtschaftsinformatik GmbH, Schwarzenbergstr. 4, D-96050 Bamberg
- Kreditkartenaquirer - Elavon Financial Services Limited, Lyoner Str. 36, 60528 Frankfurt am Main, Germany
- American Express Payment Services Limited, Theodor- Heuss-Allee 112, 60486 Frankfurt am Main, Germany

Purchase via PayPal:

- PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

Purchase via Miles and More

Miles & More GmbH, MAC Main Airport Center, Unterschweinstiege 8, 60549 Frankfurt am Main, Germany

Your payment data is recorded directly by the billing services and are not recorded by T-Mobile HotSpot GmbH.

The billing information is only recorded for the purpose of maintaining an error free instructure and for answering billing related question. The billing information is delete after 90 days.

Storage Period of Base Data and Payment Data (voucher customer)

When purchasing a voucher all base data and payment data are deleted after 90 days. If you have decided to save a preferred payment method to your user account, you can delete it in your app at any point in time. If you do not delete it, it will be stored as long as it is valid.

Authorizations

For the app to work on your device, it needs access to various functions and data on the device. You need to grant certain authorizations to do so (Art. 6 (1) a GDPR).

The authorization categories are programmed differently by the various manufacturers. With Android for example, individual authorizations are grouped into authorization categories and you can only agree to the authorization category as a whole.

However, please remember that in the case of revocation you may not have access to the full range of functions offered by our app.

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If you have granted authorizations, we will only use them to the extent described below:

Internet communication

The app requires access to the Internet via Wi-Fi or mobile communications for the following purposes. In order to purchase connectivity on board an aircraft, the app must be able to use the WiFi of the device

Camera, microphone, USB, photos, videos, message content, etc.

The app requires access to the camera for the following purpose: To scan vouchers and add them your account so that you can redeem them.

Does the app send push notifications?

The app does not send you any push notifications.

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