

Data privacy information Telekom MobilitySolutions ("Telekom") for Telekom Carsharing

The protection of your personal data has a high priority for the Telekom MobilitySolutions (DeTeFleetServices GmbH). It is important for us to inform you about what personal data is collected, how they are used and what options you have in this regard.

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

Necessary processing for the provision of the digital service (Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG).

When using Telekom Carsharing, hereinafter referred to as the digital service: you can, after prior registration in our web application, book rental vehicles and start and end the rental process.

Your login data (user name and password) are required for this. These are stored locally to avoid having to log in again each time the app is closed. The storage period is 30 days.

When you use the app, our servers temporarily record the IP address of your device and other technical characteristics, such as the requested content (Art. 6 para. 1 b DSGVO).

Authorizations for access to data and functions of the end device by the digital service

In order to be able to use the digital service on your device, it must be able to access various functions and data on your device. To do this, it is necessary for you to grant certain permissions (Art. 6 para. 1a GDPR, §25 para. 1 TDDDG).

The permissions are programmed differently by the different manufacturers. For example, individual permissions can be grouped into permission categories, or you can agree to only the permission category as a whole.

Please note that in the event of a conflict between one or more authorizations, you may not be able to use all the features of our digital service

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

Location

We need information about your current location for the following purpose:

The location data is required so that the user can display on a map where he himself and the vehicle are located before starting the journey. He can then be guided to the vehicle. This function is optional. The release of location data can also be deactivated.

Internet communication

The digital service requires access to the Internet via W-LAN or mobile communications for the following purposes.

The service is a cloud-based service, Internet access is a basic requirement. This is required, for example, to be able to create a new booking, query the fuel card PIN, report a damage and, most importantly, to start and end the journey.

${\bf Camera, microphone, USB, photos, videos, message\ content, etc.}$

The digital service requires access to the ${\bf camera}$ for the following purpose:

The camera is only needed in the case of reporting a damage to the vehicle, to be able to add a photo to the damage report. However, this is optional. Sharing the camera can also be disabled.

The digital service requires access to the **microphone** for the following purpose:

In addition to keyboard input, text can also be dictated. Voice input (Google) or dictation (Apple) is a functionality provided by the operating system of our app. When used, the speech is processed by a third party (e.g. Apple or Google) as the responsible party and the result is delivered to our app and output in the input field. For details on the functionality and how you can enable or disable its use, please contact the respective operating system manufacturer.

Additional Permissions

The digital service requires access to the memory for the following purpose:

Access to the memory is only required in the case when damage to the vehicle is to be reported in order to be able to add a previously saved photo to the damage report. However, this is optional. Camera sharing can also be disabled.

Does the digital service send push notifications?

Push notifications are messages that are sent to your device and displayed there in a prioritized manner. This digital service uses push notifications if you have given your consent during installation or first use (Art. 6 para. 1a GDPR).

You can disable the receipt of push notifications at any time in your device's settings.

Is my usage behavior evaluated, e.g. for advertising or tracking?

We want you to enjoy using our digital services and using our products and services. In order for you to find the products that interest you and for us to be able to design our digital service in a user-friendly way, we analyse your usage behaviour in pseudonymised form. Within the framework of the legal regulations, user profiles are created. In the following, we provide you with general information about the various purposes of the processing. By clicking on the "Consent to data processing" query, which appears when you access our digital service, you have the option of agreeing to the processing or rejecting it in part or in full. Processing necessary for the provision of the digital service (see explanation above under 1.) cannot be refused.

Basic digital service functionality

These processing's are always active and necessary for our digital service to function properly.

Functional

These processing's are necessary for you to be able to navigate through the Digital Service and use essential functions. They enable basic functions such as booking a vehicle or starting or ending journeys and accessing secure areas of the digital service. In addition, they are used for the anonymous evaluation of user behavior, which we use to continuously develop our digital service for you. The legal basis for this processing is §25 (2) No. 2 TDDDG, Art. 6 (1b) GDPR or, in the case of third countries, Art. 44 et seq. GDPR.

Processing purpose according to consent category	Login
Processing company with company address/data recipient	The web service Fleetster is a product of Next Generation Mobility GmbH, Zielstattstr. 13, 81379 München. DeTeFleetServices GmbH is responsible for data protection. Next Generation Mobility GmbH acts on behalf of DeTeFleetServices GmbH
Products used/short description of the service used	The web service Fleetster is used for login.
Description of specific processing purpose	Used to log in and store login data (username and password) locally to avoid logging in again after each closure of the digital service.
Responsibilities	DeTeFleetServices GmbH is responsible for data protection. Next Generation Mobility GmbH acts on behalf of DeTeFleetServices GmbH.
Processed data	This web service processes the following data or data categories: Login data; IP address
Storage period	30 days
Legal basis (Processing)	This web service is used on the basis of §25 (2) No. 2 TDDDG, Art. 6 (1b) GDPR.

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Third country processing	
Legal basis (Third country	
processing	

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Processing purpose	Display of vehicle location
according to consent	
category	
Processing company with	Google Ireland Ltd., Gordon House,
company address/data	Barrow Street, Dublin 4, Ireland.
recipient	
Products used/short	Google maps
description of the service	
used	
Description of specific	Used to display the vehicle's location.
processing purpose	
Responsibilities	Google Ireland Ltd., Gordon House,
	Barrow Street, Dublin 4, Ireland.
Processed data	Usage data (e.g. websites visited,
	interest in content, access times) and
	meta/communication data (e.g. device
	information, IP addresses)
Ctours movied	Variables was a data in a state and by
Storage period	Your online usage data is not stored by DeTeFleetServices. The web service has
	a functional period of 18 months.
Legal basis (Processing)	This web service is used on the basis of
	Art. 44 et seg.
Third country processing	Your online usage data is processed in
	United States of America. The EU
	Commission has issued an adequacy
	decision for these countries
	(https://commission.europa.eu/law/law-
	topic/data-protection/international-
	dimension-data-protection/adequacy-
	decisions en)
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Legal basis (Third country	Consent pursuant to Art 49 GDPR
processing	

Notice of tools not used

We use for sending push notifications on Android, Firebase Cloud Messaging, a component of Firebase from the company Google. Related code fragments with a reference to other Firebase tools such as Google AdMob, Google CrashLytics, Google Firebase Analytics, etc. are possible. However, these tools are not active and are not used for any evaluations.

Optional Processing

These processing's are used when you use additional features, such as entering text via the dictation function or displaying your own location and navigation to the location of the vehicle. The possible functions are explained in section 1 of this Privacy Policy. The legal basis for this processing is §25 (1) TDDDG, Art. 6 (1) (a) GDPR or, in the case of third countries, Art. 49 (1) (a) GDPR.

Processing purpose according to consent category	Text input via microphone
Processing company with company address/data recipient	Depends on operating system: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland or Apple Distribution International Ltd., Hollyhill Industrial Estate, Hollyhill, Cork, Ireland.
Products used/short description of the service used	Text input function of the operating system of the end device.
Description of specific processing purpose	Used for optional text input via microphone to perform functions of the digital service.
Responsibilities	Depends on operating system: Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland or Apple Distribution International Ltd., Hollyhill Industrial Estate, Hollyhill, Cork, Ireland.

Processed data	Usage data (e.g. entered texts, access times) and meta/communication data (e.g. device information, IP addresses)
Storage period	Until deactivation
Legal basis (Processing)	This web service is used on the basis of Art. 49 (1) (a) GDPR
Third country processing	Your online usage data is processed in United States of America. The EU Commission has issued an adequacy decision for these countries (https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions en)
Legal basis (Third country processing	Consent pursuant to Art 49 GDPR

Processing purpose	Display of your own location
according to consent	
category	
Processing company with	Google Ireland Ltd., Gordon House,
company address/data	Barrow Street, Dublin 4, Ireland.
recipient	, ,
Products used/short	Google maps
description of the service	
used	
Description of specific	Used for optional display of your own
processing purpose	location and navigation to the location
processing purpose	of the vehicle
	of the venicle.
Responsibilities	Google Ireland Ltd., Gordon House,
-	Barrow Street, Dublin 4, Ireland.
	, ,
Processed data	Usage data (e.g. websites visited,
	interest in content, access times) and
	meta/communication data (e.g. device
	information, IP addresses)
Storage period	Until deactivation
Legal basis (Processing)	This web service is used on the basis of
	Art. 49 (1) (a) GDPR.
Third country processing	Your online usage data is processed in
	United States of America. The EU
	Commission has issued an adequacy
	decision for these countries
	(https://commission.europa.eu/law/law-
	topic/data-protection/international-
	dimension-data-protection/adequacy-
	decisions en)
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Legal basis (Third country	Consent pursuant to Art 49 GDPR
processing	

Where can I find information that is important to me?

Additional information on data protection when using our products, in particular on the purposes of use, deletion periods, etc., can be found in the data protection information for the respective product under www.telekom.de/datenschutzhinweise, in the Telekom Shop or under www.telekom.com/datenschutz.

What rights do I have?

You have the right to:

- to request information on categories of data processed, processing purposes, possible recipients of the data, the planned storage period (Art. 15 GDPR);
- request the correction or completion of incorrect or incomplete data (Art. 16 GDPR);
- to revoke a given consent at any time with effect for the future (Art. 7 para. 3 GDPR);
- d) to object at any time for the future to data processing that is to be carried out on the basis of a legitimate interest, for reasons arising from your particular situation (Art. 21 para. 1 GDPR), stating these reasons. You can object to data processing for direct marketing purposes at any time without stating these reasons (Art. 21 para. 2, 3 GDPR);

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- in certain cases, request the deletion of data within the framework of Art. 17 GDPR in particular if the data is no longer required for the intended purpose or is processed unlawfully, or if you have withdrawn your consent in accordance with (c) above or have declared an objection in accordance with (d) above;
- f) under certain conditions, to demand the restriction of data if deletion is not possible or the obligation to delete is disputed (Art. 18 GDPR);
- data portability, i.e. You can receive your data that you have provided to us in a commonly used machine-readable format, such as z.B. CSV, and, if necessary, transmit it to others (Art. 20 GDPR;)
- to complain to the competent supervisory authority about the data processing (for telecommunications contracts: Federal Commissioner for Data Protection and Freedom of Information; otherwise: State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia).

To whom does Deutsche Telekom share my data?

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.

Due to legal obligation: In certain cases, we are required by law to transmit certain data to the requesting government entity.

Where will my data be processed?

Your data will be processed in Germany and in other European countries. In all other respects, the following applies: If data processing takes place in third countries, this will take place insofar as you have expressly consented to this or if it is necessary for our provision of services to you or if it is provided for by law (Art. 49 GDPR).

Your data will only be processed in third countries if certain measures are taken to ensure that an adequate level of data protection is in place (e.g. adequacy decision of the EU Commission or so-called suitable safeguards, Art. 44 et seq. GDPR, (see here).

Who is responsible for data processing? Who is my contact person if I have questions about data protection at Deutsche Telekom?

The data controller is the DeTeFleetServices GmbH, Friedrich-Ebert-Allee 140, 53113 Bonn. If you have any questions, you can contact our customer service or our data protection officer, Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn, datenschutz@telekom.de.

Status of the Privacy Policy: 12-02-2025

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