



# Data privacy information Telekom Deutschland GmbH („Telekom“) for eShop

The protection of your personal data has a high priority for Telekom Deutschland GmbH.

It is important to us to inform you about what personal data are collected, how they are used and what options you have in this regard.

## What data are collected, how are they used and how long are they stored?

When using T-Systems eShop hereinafter referred to as online service (Art. 6 para. 1b GDPR, §25 para. 2 No. 2 TTDSG (Telecommunications Telemedia Data Protection Act)):

### For proper rendering of our services

We use your personal data exclusively for the technical administration of our online service and to meet your wishes and requests. Other personal details, such as your name, address, telephone number or e-mail address, are not recorded unless you provide this information voluntarily or in the course of registering in the eShop. The data you supply when contacting us, the extent of which can be seen in the contact form, are used exclusively by Telekom Deutschland GmbH and T-Systems International GmbH to respond to inquiries and provide services. Only if you have given us your prior consent do we also use this data for product-related surveys and marketing purposes—but only to the extent required in each specific case and only in accordance with your prior consent. Personal data will only be disclosed to third parties if express consent has been given by the individual concerned. Our partners are contractually obligated to treat your data confidentially and in accordance with legal provisions. You decide when registering whether we may use your data for our own marketing purposes. You will only receive advertising from us if you agree to your data being used in this way. You may opt out of such use and withdraw any prior consent at any time.

**Contract data:** When you register, we process and use the data collected upon conclusion of the contract and during the term of the contract that are required for both sides to properly perform the contract, as well as any data provided voluntarily (contract data). Contract data include the form of address, last name, first name, address, date of birth, telephone numbers and/or e-mail addresses, data for settlement of payments, sales data - broken down according to the service you use, products and information about the products you are already using. If you set up additional users, their data will also be stored. Your contract data will only be retained beyond the end of the contract in accordance with contractual regulations, and such storage is limited to the required minimum. We will store the text of the contract and send you your order data by e-mail. Your contract data will be deleted 90 days after the contract is terminated, by deleting your user account.

**Usage and billing data:** For proper rendering of our services and for billing purposes we store and use your billing data in accordance with legal regulations. Billing data includes information on the start and end of each usage and the services used.

**Customer data processing with Salesforce:** To process customer service requests and enable customer communication by e-mail or telephone in accordance with the permissions you have given us, your personal customer data is stored and processed in our CRM system (Salesforce Service Cloud and Salesforce Marketing Cloud). The CRM system is operated by Salesforce Inc. Your data (company, contact, address, telephone number, e-mail, application user (name/e-mail address) and marketing permissions) is hosted in Europe, Canada and the USA by Salesforce and encrypted in unaltered form (i.e. neither anonymized nor pseudonymized) using a standardized process, and is thus inaccessible to Salesforce itself.

If you have given us permission to do so, we will collect e-mail usage information (whether e-mail has been opened, clicks) via this system in order to improve our service for you and provide you with suitable information. If you no longer agree to this, you can opt out at any time under “Your account”.

### Payment with credit card

When paying by credit card, we use the 3D Secure 2.0 method. Through the individual, data-based risk assessment, transactions can be approved directly and without further buyer interaction (input of a 3D Secure Code). For the purpose of risk assessment, the shop system sends the following

data via the payment service provider to the card-issuing bank (issuer): Company name, billing address (city, street, postal code, country).

When you use our online service, our servers temporarily record the domain name or IP address of your terminal device as well as other data, such as the content requested or the response code.

The logged data are used exclusively for data security purposes, in particular to defend against attempted attacks on our web server (Art. 6 para. 1f DSGVO). They are neither used for the creation of individual application profiles nor passed on to third parties and are deleted after 7 days at the latest. We reserve the right to statistically evaluate anonymized data records.

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

#### Explanations and definitions

We want you to enjoy using our online services and to make use of our products and services. This is in our economic interest. In order for you to find the products that interest you and for us to be able to design our online services in a user-friendly way, we analyze your usage behavior anonymously or pseudonymously. Within the framework of the legal regulations, we, or companies commissioned by us, create usage profiles. It is not possible to track this information directly back to you. In the following, we inform you in general about the different purposes. Via the query "Consent to data processing", which appears when you call up our online service, you have the option of consenting to the processing or rejecting it in part or in full. Processing that is necessary to provide the online service (see explanation above under 1.) and cannot be refused.

#### Required tools

##### Tag management

Tag management is used to manage the use of the tools on the various pages of our online service. For this purpose, a tag is defined for each page. The tag can then be used to determine which tools are to be used for this page. Tag management can thus be used to specifically ensure that tools are only used where they make sense and are legally legitimized.

#### Analytic tools

##### Market research / Reach measurement

The aim of reach measurement is to statistically determine the intensity of use and the number of users of an online service, as well as to obtain comparable values for all connected offers. Market research aims to learn more about the target groups that use services or applications and view ads. At no time are individual users identified. Their identity always remains protected.

#### Marketing tools

##### Profiles for needs-oriented design of the online service

In order to be able to constantly improve the online service, we would like to create so-called clickstream analyses. The clickstream corresponds to your movement in the online service. The analysis of the movement paths provides us with information about the usage behavior. This allows us to identify possible structural errors and thus improve the user experience.

##### Profiles for personalized recommendations

Telekom would like to offer you individually adapted, personalized, action and click recommendations for offers, services or products. To do this, we use service providers to create a pseudonymous profile of the online services you access on the Internet and assign categories to this profile. You will be shown content or information that matches the profile.

#### Required tools

These tools are necessary for you to navigate through the online service and use essential functions. They enable basic functions, such as order processing in the online store and access to secure areas of the online service. Furthermore, they serve the anonymous evaluation of usage behavior in order to continuously develop our online service for you. The legal basis for these tools is §25 para. 2 no. 2 TTDSG (Telecommunications Telemedia Data Protection Act), Art. 6 para. 1b GDPR or, in the case of third countries, Art. 44 ff. GDPR.

Company	Purpose	Storage period	Country of processing
T-Systems	Shopping cart	Session cookie	Germany
Telekom	Login	Session cookie or 12 months (staying logged in)	Germany
Tealium	Tag management	Cookie (3 months)	Netherlands
Mapp (formerly Webtrekk)	Improvement Website, failure analysis	Cookie (6 months)	Germany

### Analytic tools

These tools help us to better understand usage behavior.

Analytic tools enable the collection of usage and recognition data by us or third parties, in so-called pseudonymous usage profiles. For example, we use analytic tools to determine the number of individual users of an online service or to collect other statistics relating to the operation of our products, as well as to analyze usage behavior based on anonymous and pseudonymous information about how users interact with online services. It is not possible to draw any direct conclusions about a specific person. The legal basis for these tools is §25 para. 1 TTDSG (Telecommunications Telemedia Data Protection Act), Art. 6 para. 1a GDPR or, in the case of third countries, Art. 49 para. 1a GDPR.

Company	Purpose	Storage period	Country of processing
Mapp (formerly Webtrekk)	Customized design, marketing, personalization, newsletter	Cookie (30 days)	Germany

### Marketing /Retargeting

These tools are used to show you personalized and therefore relevant promotional content.

Marketing tools are used to display interesting advertising content and to measure the effectiveness of our campaigns. This is done not only in Telekom online services, but also in other online services (third-party providers). This is also referred to as retargeting. It is used to create pseudonymous content or ad profiles, to serve relevant ads in other online services and to derive insights about target groups that have viewed the ads and content. It is not possible to draw any direct conclusions about a person in this context. Marketing and retargeting tools help us to display potentially relevant advertising content to you. By suppressing marketing cookies, you will continue to see the same number of advertisements, but they may be less relevant to you. The legal basis for these cookies is §25 para. 1 TTDSG (Telecommunications Telemedia Data Protection Act), Art. 6 para. 1a GDPR or, in the case of third countries, Art. 49 para. 1a GDPR.

Company	Purpose	Storage period	Country of processing
Adform	Advertising	Cookie (30 days)	Germany

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

This privacy policy provides an overview of the points that apply to Telekom's processing of your data in this online service.

Further information, including on data privacy in general and in specific products, is available at <https://www.telekom.com/en/company/data-privacy-and-security/governance-data-privacy> and at <https://www.telekom.com/en/deutsche-telekom/privacy-policy-1744>.

### Who is responsible for data processing? Who do I contact if I have questions about the data privacy policy at Telekom?

T-Systems International GmbH is responsible for data. If you have any questions, please contact our Customer Services department or our data privacy officer, Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany, [privacy@telekom.de](mailto:privacy@telekom.de).

### What rights do I have?

You have the right,

- To request **information** on the categories of data processed, the purposes of processing, any recipients of the data, or the planned storage period (Art. 15 GDPR);
- to demand the **correction** or completion of incorrect or incomplete data (Art. 16 GDPR);
- to **revoke** given consent at any time with effect for the future (Art. 7 para. 3 GDPR);
- to **object** 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 (1) GDPR);
- in certain cases, within the framework of Art. 17 GDPR, to demand the deletion of data in particular, insofar as the data are no longer required for the intended purpose or is processed unlawfully, or you have revoked your consent in accordance with (c) above or declared an objection in accordance with (d) above;
- under certain conditions, to demand the **restriction** of data, insofar as deletion is not possible or the obligation to delete is disputed (Art. 18 GDPR);
- to **data portability**, i.e. you can receive your data that you have provided to us in a conventional machine-readable format, such as CSV, and transmit it to others if necessary (Art. 20 GDPR);
- to issue a complaint to the competent **supervisory authority** about the data processing (for telecommunication contracts: Federal Commissioner for Data Protection and Freedom of Information; otherwise: State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia).

### To whom does Telekom pass my data?

To **order processors**, i.e. companies that we commission with the processing of data within the scope provided by law, Art. 28 GDPR (service providers, vicarious agents). Telekom remains responsible for the protection of your data even in this case. We commission companies in the following areas in particular: IT, sales, marketing, finance, consulting, customer service, human resources, logistics, printing.

To **cooperation partners** who independently provide services for you or in connection with your Telekom contract. This is the case if you order services from such partners from us, if you consent to the involvement of the partner or if we involve the partner on the basis of legal permission.

**Due to legal obligation:** In certain cases, we are legally obligated to transmit certain data to the requesting government agency.

### Where are my data processed?

Your data are processed in Germany and other European countries. If, in exceptional cases, processing of your data also takes place in countries outside the European Union (in so-called third countries), this will happen,

- if you have expressly consented to this (Art. 49 para. 1a GDPR). (In most countries outside the EU, the level of data protection does not meet EU standards. This applies in particular to comprehensive monitoring and control rights of state authorities, e.g. in the USA, which disproportionately interfere with the data protection of European citizens,
- or insofar as it is necessary for our provision of services to you (Art. 49 para. 1b DSGVO),
- or insofar as it is provided for by law (Art. 6 para. 1c GDPR).

Furthermore, your data will only be processed in third countries if certain measures ensure that an adequate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, Art. 44ff GDPR).

Status of privacy policy 03/01/2024