



# Data privacy information Deutsche Telekom AG („Telekom“) for Winners' Circle

Deutsche Telekom AG 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.

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

### **When registering for the competition:**

To register for the competition, you will have to enter your last name, first name, pseudonym, address, cellphone number, employee number and email address. This data is required for participation in the contest and is stored on the servers of AchtS GmbH as long as you are joining Winners' Circle.

The login data will be needed for accessing your personal account via website and/or app which provides you with Winners' Circle content and contest information and your personal KPIs (Art. 6 (1) a GDPR).

**De-registration from the contest:** all your personal data including your competition results will be deleted within 30 days after ending of the annual contest in which the de-registration took place.

**During the competition:** the personal data will be processed and used to keep you continuously updated about the results, point allocation, for evaluations and being able to contact you about winnings and for regular information on the competition, to compile a favorites list under a pseudonym, to give out prizes and using the connected online shop.

**During temporary absence:** the personal data will be stored but locked during a temporary absence until the user will return to the program or leave the program at all. On request of the user the data will be deleted latest 30 days after the end of current contest. To return then a new registration is required.

**When using the app:** When you use the app, our servers will temporarily record your device's IP address and other technical details, such as the requested content (Art. 6 (1) b GDPR).

**When using the website:** When you use the website, our servers will temporarily record your device's IP address and other technical details, such as the requested content (Art. 6 (1) b GDPR).

### **Winner of the main prize:**

In case of being a winner of the main prize at the end of a contest period, your personal data will be used and processed for the necessary activities around the main prize by Deutsche Telekom AG and the suppliers who are involved in the preparations for the main prize. Your name may also be published on the official Winners' Circle website and App (Art. 6 (1) a GDPR).

### **Miscellaneous:**

When using the contact function your data will be transferred to the connected ticket system until your issue is solved. Parts of the transferred data will be kept for improving the quality of the services.

### **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 authorizations are programmed differently by the various manufacturers. Individual authorizations may e.g. be combined in authorization categories, and you can only grant consent to the authorization category as a whole.

Please remember that if you withhold consent for one or a number of authorizations, you may not have access to the full range of functions offered by our app.

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

### **Photos, media, other content**

The app requires access to photos, media and other content to be able to use the Social Wall function. Data will be stored until further notice. Data will be deleted upon notice of the user (report this content function) towards the support.

### **Does the app send push notifications?**

Push notifications are messages that the app sends to your device and that are displayed with top priority. This app uses push notifications by default, provided you have given your consent during the app installation or the first time you use the app (Art. 6 (1) a GDPR).

You may deactivate the push notifications at any time with the feature within your operating system messaging settings. For help see the manual of your respective operation system.

The above mentioned data is processed by the contract data processors AchtS GmbH (competition related data, login and support), DOM Digital Media Online GmbH (website and app content) and Haarhoff GmbH (online shop, delivery).

### **Will my usage habits be evaluated, e.g. for advertising purposes or tracking?**

#### **Explanations and definitions:**

We want you to enjoy using our app and/or website and take advantage of our products and services. We have an economic interest in ensuring this is the case. We analyze your usage habits on the basis of anonymized or pseudonymized data so you can find the products that interest you and so we can make our app user-friendly. We or companies commissioned by us to process data create usage profiles to the extent permitted by law. This information cannot be traced back to you directly. The following information is intended to provide you with general information on the various purposes of processing data. You can change your data protection settings to consent to the use of the tool or reject their use accordingly. Tools that are strictly necessary to provide the app cannot be rejected (see explanation at 1. above).

#### **Tag / Cookie management (strictly necessary)**

Tag / Cookie management is used to manage tracking tools in apps / websites. A tag is set for each page to do this. Based on the tag, the system can determine which tracking tools should be used for this page. Tag management can be used to specifically control tracking so that the tools are only used where appropriate.

#### **Market research / Reach measurement (opt-in)**

Reach measurement aims to statistically determine an app's use intensity and the number of users as well as obtaining comparable figures for all the connected services. Individual users are not identified at any time. Your identity is always protected.

#### **Improvement of the app's and website's technical quality (opt-in)**

To measure the quality of the app and website programming or to register crashes and causes, the program sequence and usage habits are analyzed. Individual users are not identified.

#### **Profiles for a user-gated presentation of the app (opt-in)**

To continuously improve the app/website, we also use the events captured in the event tracking. These retrace your navigation within the app. Analyzing this navigation allows us to obtain insights about the app's/website's usage patterns, which in turn allows us to detect any problematic user experiences and improve the app accordingly. Individual users are not identified at any time.

#### **Profiles for personalized recommendations (opt-in)**

Deutsche Telekom provides you with personalized action and click recommendations for offerings, services or products. This involves the service provider creating a pseudonymized profile of the events you have triggered in the app (e.g. the services and pages you have accessed) and allocating categories to the profile. The system displays content or information that matches your profile. At no time are individual users identified or personal data used for the profile.

#### **Strictly necessary tools**

These tools are strictly necessary to enable you to navigate the pages and use essential functions. They enable basic functions, such as order processing in the online shop and access to secured areas of the app and website. They also serve the purpose of performing an anonymous analysis of user patterns, which we use to continuously develop and improve our app/website for you. The legal basis for these tools is Art. 6 (1) b GDPR.

Company	Purpose	Storage period	Involved as	Country of processing
Acht S	Login	Account-Lifetime	Processor	Germany
DOM	Navigation	Session	Processor	Germany

**if the use of tools is optional**

These tools are activated when you use additional functions, e.g. the chat. The possible functions are explained in section 1 of this Data Protection Statement. The legal basis for these tools is Art. 6 (1) a GDPR.

Company	Purpose	Storage period	Involved as	Country of processing
Firebase	Push messages	28 days	Processor	USA
Freshdesk	Support	24 months	Processor	Germany

**Analysis tools**

These tools help us to improve our understanding of how our apps are used.

Analysis tools allow for the collection of usage and identification data by the original provider or third party providers and their compilation into pseudonymous usage profiles. We use analysis tools, e.g., to determine the number of individual users of an app, to collect technical data if the app has crashed, and to analyze the app's usage patterns and user interactions on the basis of anonymous and pseudonymous information. This information cannot be traced back to a person. The legal basis for these tools is Art. 6 (1) a GDPR.

Company	Purpose	Storage period	Involved as	Country of processing
<a href="#">Matomo</a>	Technical app / website quality and customized design	Account-Lifetime	Processors	Germany

**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?**

Deutsche Telekom AG 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](mailto:datenschutz@telekom.de).

**What rights do I have?**

You have the right

- b) To request that incorrect or incomplete data be **rectified** or supplemented (Article 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 (Article 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 object 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 the data that you provided to us in a commonly used and machine-readable format such as CSV, and can, where necessary, transfer 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, Article 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, and 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 order services of these partners from us, if you consent to the involvement of the partner, or if we involve the partner on the basis of legal permission.

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

**Where is my data processed?**

As a general rule, your data will be processed in Germany and other European countries.

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

This Data Protection Statement was last updated 25.11.2021