



# Data privacy information of Telekom Deutschland GmbH (“Telekom”) for the website

## General information

Telekom Deutschland GmbH attaches great importance to protecting your personal data. It is important to us to inform you what personal data we collect, how your data is used, and how you can influence the process.

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

- When using the website, hereinafter referred to as online service: When you use our online service, our servers temporarily record the domain name or the IP address of your device and other data, such as the requested content or the response code (Article 6 (1) b GDPR, §25 (2) No. 2 Telecommunications-Telemedia Data Privacy Act (*Telekommunikation-Telemedien-Datenschutz-Gesetz – TTDSG*)).

The recorded data is used solely for data security purposes, particularly to protect against attempted attacks on our web server (Article 6 (1) f GDPR). We do not use it to create individual user profiles, nor do we share this information with third parties. It is erased after 7 days at the latest. We reserve the right to statistically analyze anonymized data records.

- **User surveys/customer feedback with GetFeedback:** We use the service from the company [SurveyMonkey Europe UC](#) (2 Shelbourne Buildings, 2nd Floor, Shelbourne Road, Ballsbridge, Dublin 4, Ireland) for customer surveys (Note: SurveyMonkey has acquired the previously used company Usabilla and the tool with the same name). Ratings and your feedback can be obtained (Article 6 (1) a GDPR). Our customers' opinions and improvement suggestions crucially help us improve our online services. Only anonymous information is processed and there is no way of tracing the sender. Personal data or personally identifiable data is not transferred at any time. We store and analyze the data for a period of 24 months.

There are two different ways of conducting the surveys:

- i. The feedback buttons. You can use this button at any time to provide us with your feedback. No data is transferred unless you use this function.
  - ii. Display of an active feedback survey. You can reject this survey or cancel it at any time. Answers are only sent once you have completed the survey.
- **Chatbot:** If you use the chatbot (“Frag Magenta”) as self-service or to contact Customer Service, different types of information will be transmitted to the communication platform during the automated chat (Article 6 (1) a GDPR). This includes, for example, the questions and answers you have entered (chat history), or your customer data if you have logged in with your Telekom login credentials. We process the collected data in the cloud-based communication system provided by our processor [IBM Deutschland GmbH](#) (“IBM,” Wilhelm-Fay-Strasse 30-34, 65936 Frankfurt, Germany). Any personal data, such as your name, address, telephone number, or email address, will be pseudonymized before being transmitted to the processor. The data will be hosted in the IBM cloud data center located in Frankfurt am Main, Germany. To further improve this service, any potentially personal data will be deleted from the data records by an anonymization service before it is used. The pseudonymized chat history will be erased when the exchange is ended. If necessary and subject to your consent, the chatbot may wish to transfer you to our Customer Service text chat. Provided you are logged into your Telekom account, this will entail the transmission of the chat history and any available customer data to the text chat.
  - **Text chat:** If you use the text chat to contact Customer Service, various types of information are sent to the customer adviser when you initialize the chat (Article 6 (1) a GDPR). This includes login data, customer data (telephone number, customer number, and latest chat history), as well as the help topic you have selected, the versions of your browser and operating system, and similar data. For fault identification and troubleshooting with technical complications, communications metadata (such as time stamp, session ID, referrals) and supplementary information (such as device and operating system, channel, etc.) are stored and used where necessary. The communications metadata and the message content of all chats including the personal data are stored for just up to 8 days if you are not a Telekom customer. The chats are also stored until further notice in anonymized form. In the case of a contractual basis, i.e., you are a Telekom customer, we store the histories and communications metadata pursuant to § 257 German Commercial Code (*Handelsgesetzbuch – HGB*) normally as

commercial letters and, in addition, the anonymized histories and the pseudonymized metadata for customer support with follow-up contacts and for quality improvement purposes. The chat platform provided by the processor [Genesys Telecommunications Lab. GmbH](#) (Herzogspitalstrasse 24, 80331 Munich, Germany) will also regularly transmit information about the availability of the chat service. A session cookie will then be placed on the computer for the duration of the session. The cookie is erased once the session has ended. We reserve the right to statistically analyze anonymized data records.

- **SMS messaging:** If you use SMS messaging for contacting Customer Service, different types of information will be collected when you make contact for the first time (Article 6 (1) a GDPR). This includes, for example, your cell phone number, first and last name, and the nature of your inquiry. The processing takes place via the internal chat platform of Telekom and the processor, which is Genesys. We store the session content for a maximum of 12 months and will use it for any queries that may arise. We reserve the right to statistically analyze anonymized data records.
- **Text chat TelekomCLOUD:** If you use the text chat on the TelekomCLOUD online service to contact Customer Service, different types of information are sent to the chat system (Article 6 (1) b, f GDPR) and are erased after seven days. This includes your IP address, browser version, operating system version; our customer adviser cannot view this data. The data created during the service chat is transferred to our CRM system (Salesforce Service Cloud). The CRM system is operated by Salesforce Inc. and is hosted in Europe. The system erases the chat content within 24 hours. Additional chat data (starting time, chat duration, internal remarks, customer data requested during the chat) is anonymized after 28 days. The chat platform also regularly transfers information regarding the accessibility of the chat service function to the TelekomCLOUD online service. Using this information, the button on the online service to start the text chat is enabled or disabled.
- **TelekomCLOUD Marketplace:** We will use your personal data exclusively for the technical administration of the online service and to meet your wishes and requests. Other personal details, such as your name, address, telephone number, or email address are not recorded unless you provide this information voluntarily or in the course of registering in the TelekomCLOUD marketplace. The data you supply when contacting us, the extent of which can be seen in the contact form, is processed exclusively by Telekom Deutschland 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. When you register, we process and use the contract data collected upon conclusion of the contract and during the term of the contract that is required for both sides to properly perform the contract, as well as any data provided voluntarily (contract data). Contract data includes the form of address, last name, first name, address, date of birth, telephone numbers and/or email addresses, data for settlement of payments, sales data – broken down according to the services 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 email. Your contract data will be erased at the latest 90 days after termination of the contractual relationship by deleting your user account. Usage and billing data: We store and use billing data for the proper provision of our services and for billing purposes. 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 email 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 personal data is encrypted and is thus inaccessible to Salesforce itself.

If you have given us permission to do so, we will collect email usage information (whether email has been sent, 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 “My Settings.”

- **Customer feedback with Salesforce Survey:** If you use our support services, we will invite you by email if necessary to participate in a customer satisfaction survey. Participation in the survey is voluntary and is used to improve the quality of our services. In this case, the survey results are linked to the corresponding customer transaction and stored in personalized form so the associated service can be rated specifically. To complete the survey, the system will forward you to the company's website [Salesforce](https://www.salesforce.com) (Salesforce.com Germany GmbH, Erika-Mann-Str. 31-37, 80636 Munich, Germany). Further information on legal and data-processing principles is available at <https://www.salesforce.com/company/legal/>.
- For the **identity check** required when entering into a contract, the video chat uses the Video Ident service provided by our processor, which is [Purpleview GmbH](#) (Article 6 (1) b GDPR). The video chat and the Video Ident service will place a session cookie, which remains on the computer for the duration of the web session and is erased once the web session has ended. We will only store data about the session, and in particular its start and end times, for a duration of seven days. No video content is stored.
- **Fraud prevention:** To prevent fraud in our online service, we have retained the fraud prevention services of [Risk.Ident GmbH](#) (Am Sandtorkai 50, 20457 Hamburg, Germany) (Article 6 (1) b GDPR). Risk.Ident collects and processes data on our online service's using cookies and tracking technology to ascertain the user's device. Wherever Risk.Ident collects IP addresses, these are anonymized immediately. The data processed by Risk.Ident is stored in a fraud prevention database. We access this data as part of the ordering process for risk assessment purposes. We also transfer to Risk.Ident data on devices which have already been used to commit (attempted) fraud. The data is not assigned to any one individual at any time.
- **Other:** Personal details such as your name, address, telephone number, or email address will not be collected unless you provide this information voluntarily. As part of the availability check, your stated address data is stored as a hash value in a cookie for 14 days. More information on our [newsletter](#) can be found here.

#### Does the online service send push notifications?

Push notifications are messages that are sent to your device and that are displayed with top priority. This online service uses push notifications by default, provided you have given your consent when installing the service or using it for the first time (Article 6 (1) a GDPR).

You can disable the receipt of push notifications at any time in your device settings. The processing takes place via the processors [360Dialog GmbH](#) and [MoEngage](#).

#### Controlling data used by social-media plug-ins and links to social media platforms

##### Platforms

Some pages may contain social media network buttons (e.g., Facebook, Google, Instagram, Twitter, Pinterest, Xing, or LinkedIn) which you can use to recommend the services of Telekom Deutschland GmbH to your friends and family.

To ensure you retain full control of the data, the used buttons provide direct contact between the respective social network and the visitor only once you actively click on the button (one-click solution).

We only use pictograms from the respective social media network on our pages. You will only be forwarded to the company online service of the respective social media platform when you click on a pictogram. The social media platforms and providers of third-party content that can be accessed by clicking on a pictogram provide their services and process their data under their own responsibility.

When the social media plug-in or link is activated by clicking on the pictogram, including when sharing content, (Article 6 (1) a GDPR), the following data may be forwarded to the social media provider: IP address, Last revised May 2023

browser information, operating system, screen resolution, installed browser plug-ins (such as Adobe Flash Player), previous page if you followed a link (referrer), URL of the current page, etc.

The next time you visit the page, the social media plug-ins are again provided in the preset inactive mode. This ensures that no data is transmitted when the page is visited again.

Further information on social media plug-ins and the scope and purpose of data processing by their providers, as well as additional data protection-relevant information can be found in the data privacy statements published by the respective controller and in the information on the [one-click solution on Heise.de](#).

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

##### Explanations and definitions

We want you to enjoy using our online services 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 online service user-friendly. We or companies commissioned by us create usage profiles to the extent permitted by law. This information cannot be traced back to you directly. General information on the various purposes of data processing is given below. Our “Data processing consent” pop-up that opens when you access our online service gives you the option of agreeing to data processing or rejecting data processing partially or as a whole. Processing strictly necessary to provide the online service cannot be rejected (see explanation in the section “What data is collected...” above).

##### mandatory tools

###### Tag management

Tag management allows us to manage the use of tools on the different pages of our online service. A tag is set for each page to do this. The tag content determines which tools will be used for this page. Tag management is used to assure that the tools are in each individual case only used where appropriate, legitimate, and lawful.

##### Analytical tools

###### Market research/Reach measurement

Reach measurement provides statistics on an online service's usage intensity and the number of users, along with comparable figures for all the connected services. The goal of market research is to learn more about the target audiences who use the services or applications and view adverts. Individual users are not identified at any time. Your identity is always protected.

###### Affiliate marketing

Affiliate marketing or advertising (also known as partner program) is based on the principle of the agent's commission. In this respect, payment is not made for showing the advertising. Depending on the model, the commission is only paid if the advertising was clicked or if it results in an order being placed. The advertising contains an affiliate link, e.g., in the form of a cookie with a special code that identifies the offer and the affiliate (partner) clearly with the retailer. In this way, the retailer can recognize who mediated in getting the customer to their online shop and what offer the customer chose.

##### Marketing tools

###### Profiles for designing the online service based on needs

The compilation of clickstream analyses assists us in continuously improving our online service. The clickstream corresponds to your movement on the online service. Analyzing these movements provides us with an insight into usage habits. This allows us to detect any existing structural deficiencies and thereby improve the usage experience.

###### Profiles for personalized recommendations

Telekom would like to offer you individually targeted and personalized take-action and click recommendations for special offers, services, or products. This involves our service providers compiling a pseudonymous profile about the online services accessed by you and assigning categories to the profile. The system displays content or information that matches your profile.

##### Services by other companies (independent third-party providers)

###### Services by other companies (independent third-party providers)

Telekom online service includes third-party services which provide their services independently or under joint responsibility with Telekom. In this respect, data and information is transferred to third-party providers, processed for own advertising purposes, and merged with data from third parties.

When you use the online service, cookies or similar technologies collect data and send it to third parties, in part for Telekom’s own purposes. The scope, purpose, and legal basis on which further processing is carried out for the third party’s own purposes is described below in section e. of this data privacy information.

**Cross-device and cross-partner profiles for playing out advertising and content tailored to your interests**

We use in our online service a mechanism for cross-device profile creation using IDs and email hash and transfer sociodemographic information, such as ZIP code, age group, and gender to our partner company emetriq GmbH, which also merges and processes the information with their own data to create an advertising profile for its own purposes.

**Mandatory tools**

These tools are required to enable you to navigate through the online service and use key functions. They support basic functions, such as order processing in the online shop and access to secured areas of the online service. They also serve the purpose of performing an anonymous analysis of user patterns, which we use to continuously develop and improve our online service for you. The legal basis for these tools is §25 (2) No. 2 TTDSG, Article 6 (1) b GDPR or Article 44 ff. GDPR for third countries.

Company	Purpose	Storage period	Country
<a href="#">Telekom</a>	Shopping cart	Session cookie	Germany
<a href="#">Telekom</a>	Login incl. “Remember user name”/“Stay logged in”	Cookie (6 months)	Germany
<a href="#">Tealium</a>	Tag management	Cookie (3 months)	Netherlands
<a href="#">PurpleView</a>	Video identification	Cookie (12 hours)	Germany
<a href="#">Kibana</a>	Troubleshooting, statistical analysis	90 days	Germany, India
<a href="#">Risk.Ident</a>	Fraud prevention	Code snippet	Germany

**Optional tools**

These tools are deployed when you use additional functions, such as chat. The possible functions are explained in section one of this data privacy information. The legal basis for these cookies is §25 (1) TTDSG, Article 6 (1) a GDPR or Article 49 (1) a GDPR for third countries.

Company	Purpose	Storage period	Country
<a href="#">Genesys</a>	Text chat	Session cookie	Germany
<a href="#">SurveyMonkey</a> (previously Usabilla)	User surveys	24 months	Ireland
<a href="#">IBM Germany</a>	Chatbot	Session	Germany
<a href="#">MoEngage</a>	Push messages	24 months	Germany, USA
<a href="#">360Dialog GmbH</a>	Push messages	24 months	Germany
<a href="#">Salesforce Survey</a>	Service-Portal	Cookie (6 months)	Germany, France
<a href="#">PurpleView</a>	Video consultation	Cookie (12 hours)	Germany

**Analytical tools**

These tools help us to improve our understanding of usage habits. Analysis tools allow for the compilation of usage and identification data by us or third parties into pseudonymous usage profiles. We use analysis tools, e.g., to determine the number of individual users of an online service, to collect statistical data on the performance of our products, and to analyze the visitors’ usage patterns and interactions of online service users on the basis of anonymous and pseudonymous information. This information cannot be traced back to a person. The legal basis for these tools is §25 (2) No. 2 TTDSG, Article 6 (1) a GDPR or Article 49 (1) a GDPR for third countries.

Company	Purpose	Storage period	Country
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<a href="#">Telekom</a> or <a href="#">Mapp</a> (previously Webtrekk)	Customized design and analysis	Cookie (6 months)	Germany
<a href="#">Adjust</a>	Customized design	Cookie (30 days)	Germany
<a href="#">Contiamo</a>	Customized design and market research	Cookie (24 months)	Germany
<a href="#">360Dialog GmbH</a>	Fault reports, advertising	Cookie (24 months)	Germany
<a href="#">Ipsos</a> (previously GfK)	Market research	Session cookie	Europe
<a href="#">INFOline</a>	Reach measurement	Cookie (60 days)	Europe
<a href="#">Artefact</a> (previously Metalyzer)	Affiliate	Cookie (30 days)	Germany
<a href="#">Mapp</a> (previously Teradata)	Marketing, personalization, newsletter (affiliate)	Cookie (30 days)	Germany
<a href="#">Matomo</a> (previously Piwik)	Customized design	Cookie (13 months)	Germany
<a href="#">AB Lyft</a>	A/B testing	Cookie (3 months)	Germany
<a href="#">AT Internet</a>	Customized design	Cookie (6 months)	Europe

**Marketing/retargeting tools**

These tools are used to enable the display of personalized and therefore relevant advertising content.

Marketing tools are used to serve interesting advertising content and to measure the effectiveness of our campaigns. This is done not only in Telekom’s online services, but also in other online services (third-party providers). This is also referred to as retargeting. It serves to create pseudonymous content or ad profiles, to run relevant advertising in online services and in order to derive insights about target audiences that have viewed the ads and content. This information cannot be traced back to a person. Marketing and retargeting tools assist us in serving you advertising content that is potentially relevant for you. By suppressing marketing cookies, you will continue to see the same number of ads, but they may be less relevant for your interests. The legal basis for these cookies is §25 (1) TTDSG, Article 6 (1) a GDPR or Article 49 (1) a GDPR for third countries.

Company	Purpose	Storage period	Country
<a href="#">Telekom-MPathic</a>	Customized design, advertising	Cookie (24 months)	Germany
<a href="#">Ad4Mat</a>	Advertising	Cookie (24 months)	Germany
<a href="#">Adform</a>	Advertising	Cookie (60 days)	Europe
<a href="#">Iridion</a>	Advertising	Cookie (12 months)	Germany
<a href="#">Usemax/Emego</a>	Advertising	Cookie (24 months)	Germany
<a href="#">Mapp</a> (previously Webtrekk)	Marketing automation (personalization)	Cookie (6 months)	Germany
<a href="#">emetriq</a> (previously Xplosion)	Profile generation, advertising	Cookie (12 months)	Germany
<a href="#">Linkster</a>	Advertising	Cookie (30 days)	Germany

<a href="#">Trbo</a>	Personalization	Cookie (24 months)	Germany
<a href="#">DeepMedia</a>	Customized design, advertising	Cookie (30 days)	Germany
<a href="#">Campaign 2.0</a>	Personalized offerings	4 months	Germany, India

#### Services by other companies (independent third-party providers)

We have integrated services from third-party providers that provide their services independently. When you use our online service, cookies or similar technologies may collect data and send it to third parties. Some of the data may be transmitted for Telekom’s own purposes. The legal basis for these tools is Article 6 (1) a or Article 49 (1) a GDPR. The scope, purpose, and legal basis on which further processing is carried out for the third party’s own purposes can be found in the third party’s data privacy information. Information about these independent third-party providers can be found in the following.

#### Google

##### Google – AdWords

We use the Remarketing, Google AdWords and Floodlight function from Google Inc. (“Google”) in our online service. This function is used to present targeted ads to visitors as part of the Google advertising network. Users can then be shown in the online service ads which relate to content users have accessed previously in other online services that use the Google remarketing function. According to its own statements, Google does not collect any personal data with this process. If you, however, do not want to use Google’s remarketing function, you can disable this permanently by adjusting the relevant settings at <http://www.google.com/settings/ads>. Alternatively, you can disable the use for targeted advertising via the advertising network initiative by following the instructions at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp). Further information on Google remarketing and Google’s privacy policy is available at: <https://policies.google.com/technologies/ads?hl=de/>. If you access our online service via a Google ad, Google AdWords stores a cookie on your device. This cookie becomes invalid after 30 days. No conclusions can be drawn about you as a person. We use the information collected with the aid of this conversion cookie to create statistics about our conversion rate. This means that we find out how many users came to our online service via a Google ad and acquire a product within 30 days. If you do not wish to participate in the tracking process, you can disable cookies for conversion tracking by specifying in your browser settings that cookies from the relevant domain are to be blocked: Google AdWords: [googleadservices.com](http://googleadservices.com).

##### Google – YouTube videos

YouTube collects data to provide users with better services – from determining basic information such as your language through to more complex issues, such as advertising. What data YouTube collects and how this data is used depends on how you use the services and how you manage your data privacy settings. If you are not logged in using a Google account, the collected data is stored with unique IDs linked to the browser, the app, or the device. This can, for instance, ensure that the language settings are retained during all sessions. If you have logged in using a Google account, data is also collected that is stored in your Google account and considered to be personal data. Further information can be found at: <https://policies.google.com/privacy?hl=de&gl=de>.

#### Facebook:

We use the Facebook service Customer Audience and the Facebook pixel in our online service to optimize our advertising offering, provided you have given the relevant consent to Facebook. Further information on these Facebook services and data privacy information from Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland (“Facebook”) can be accessed under the link <https://www.facebook.com/privacy/explanation>. If you use a Facebook User Account, the set Facebook cookie makes the Facebook pixel aware of this in our online service. The same cookie is used to transfer the collected usage data to Facebook for analysis and marketing purposes. You can check and/or disable directly via Facebook the way in which Facebook collects, further processes, and uses this data. The Facebook pixel is a JavaScript code which transfers the following data to Facebook:

- HTTP header information (including IP address, web browser information, storage location, document, URL of the online service and user agent, as well as date and time of use)
- Pixel-specific data; this includes the pixel ID and Facebook cookie data, including your Facebook ID (this data is used to link events to a certain Facebook advertising account and to assign them to a Facebook user)
- Additional information on visiting our online service, as well as on standard- and user-defined data events
  - Orders placed (sales transactions)
  - Registrations and trial subscriptions completed
  - Products searched; product information accessed

The aforementioned data processing only affects users that have a Facebook account or have accessed a Facebook partner page (whereby a cookie was set). The playing out of advertising on Facebook (partner) pages based on the Customer Audience service does not affect any users that are not Facebook members.

If the Facebook ID included in the Facebook cookie can be assigned to a Facebook user, Facebook assigns this user to a target audience (Custom Audience) based on the rules stipulated by us, provided the rules are relevant. We use the information obtained in this way to present Telekom advertising on Facebook (partner) pages.

If you would like to opt out from using the Facebook pixel, you can set an opt-out cookie on Facebook or disable JavaScript. Further information along with setting options for protecting your personal privacy for advertising purposes is available from the Facebook privacy guidelines at [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/).

#### LinkedIn

The retargeting and conversion tracking in LinkedIn (LinkedIn Ireland, Wilton Plaza, Wilton Place, Dublin 2, Ireland) using the LinkedIn Insight Tag enables statistical, pseudonymous data (referrer URL, IP address (shortened), device and browser characteristics) to be collected about the use of our online service and, on this basis, relevant aggregated statistics provided. This information is also used to be able to display targeted, relevant special offers and recommendations after you have expressed an interest in our online service for certain products, information, and special offers. This information is stored in a cookie for six months. You can obtain information and opt out from data processing by LinkedIn at any time at [https://www.linkedin.com/legal/privacy-policy?trk=registration\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=registration_footer-privacy-policy).

#### emetriq GmbH

emetriq is a provider of targeting services relating to online marketing of advertising space. Targeting refers to precise targeting in online marketing and personalization of content. For this purpose, emetriq operates a data pool whose aim is to significantly increase the quality of targeting so that advertisers can show relevant advertising in accordance with your interests. To enable user-specific advertising and content to be shown, emetriq GmbH, Vorsetzen 35, 20459 Hamburg, Germany, collects information on surfing behavior or app usage. Cookies, measurement pixels, APIs, or SDKs are used which can collect or process the following information:

- Pseudonymous IDs: Cookie ID, Identifier for Advertising (IDFA) or Advertising ID (AdID), IP address
- Information from the app or the browser, for instance browser ID, time zone, language, operating system
- Information on seen or clicked advertising banners
- URL of visited pages of our connected marketers
- Sociodemographic data, such as age decade, form of address, and shortened ZIP code
- Hashed login data (email)

The collected data is pseudonymized and only then further processed at the earliest possible time either already in the app or in the user’s browser or in the first processing system. All collected information on a user is stored solely with the aid of pseudonymous IDs. emetriq erases this data after six months at the latest.

To facilitate cross-device personalization of advertising, emetriq issues an identifier (ID) for each of your used devices by referencing your hashed email address. This enables the various issued IDs to be assigned to each other in those cases where you have logged into online services using different devices.

Incorporating an independent entity, known as the trusted third party, ensures that emetriq does not have access to the email address. In individual cases, this supports cross-service provider allocation of a device to a user even if this user has not logged into the Telekom online service with their device. This also enables a targeted offering to be provided without a login.

Telekom Deutschland GmbH and emetriq GmbH are joint controllers pursuant to Article 26 GDPR. If you have any queries, please contact [datenschutz@telekom.de](mailto:datenschutz@telekom.de).

This data is also processed independently by emetriq and its technology partners with a limitation to the above purposes. Further information is available from emetriq: <https://www.emetriq.com/datenschutz>. emetriq also works together with the provider [The Trade Desk Ltd. UK](#) (“TTD” for short, in 1 Bartholomew Cl, London EC1A 7BL, United Kingdom). The Trade Desk processes the IP address and usage data (such as accessed pages and products). To this end, users are assigned a randomly generated ID using a cookie that enables the user to be recognized in our online service and the online services of third parties in the TTD advertising network, and advertising campaigns to be optimized. Information on data privacy at The Trade Desk is available at <https://www.thetradedesk.com/us/privacy>.

Cookie settings: You can recall your [cookie settings](#) at any time to manage your preferences.

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

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

The controller is Telekom Deutschland GmbH, Landgrabenweg 151, 53227 Bonn, Germany. If you have any queries, please contact our [Customer Service](#) or our Global 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

- a) to request **information** on the categories of personal data concerned, the purposes of the processing, any recipients of the data, and the envisaged storage period (Article 15 GDPR);
- 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 (Article 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 Article 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 (Article 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 (Article 20 GDPR);
- h) to **file a complaint** with the responsible **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 commission to process data within the legally defined scope, Article 28 GDPR (service providers, agents). In this case, 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 Telekom contract. This is the case if you order services from these partners through 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.

#### Where is my data processed?

If, in exceptional cases, your data is processed in countries outside the European Union (known as “third countries”), this will take place only

- if you have expressly consented to this (Article 49 (1) a GDPR). (In most countries outside the EU, the level of data protection does not meet EU standards. This concerns in particular comprehensive monitoring and control rights of state authorities, e.g., in the United States, which disproportionately interfere with the data protection of European citizens,
- or to the extent necessary for our service provision to you (Article 49 (1) b GDPR),
- or to the extent required by law (Article 6 (1) c GDPR).

Furthermore, your data is processed in third countries only if certain measures ensure a suitable level of data protection (e.g., EU Commission’s adequacy decision or suitable guarantees, Article 44 et seq. GDPR).

#### So who or what is TrustPid?

The Vodafone Group and other telecommunications partners are currently running a test with selected advertisers and publishers (partners) to investigate the benefits of a new technical solution for digital advertising and personalized product recommendations in Europe. This solution is called TrustPid. Deutsche Telekom is supporting Vodafone with this test. Vodafone Sales and Services Limited, with headquarters in England, runs TrustPid. This includes operation of the platform and the data privacy portal which can be accessed at the address [www.trustpid.com](http://www.trustpid.com).

As an alternative concept to the third-party cookies which still exist today, TrustPid works with secure, unique digital tokens with limited validity. These tokens are generated by allocating random numbers. It is not possible to identify you directly as an individual via these tokens. Nonetheless, a token enables advertisers and publishers to provide you with a personalized experience on their online services, apps, and services provided you have given your explicit consent to the respective online service of the participating partners.

Telekom Deutschland GmbH and other telecommunications partners provide the network-based infrastructure for this service. That means provided you give your active consent on a partner’s respective online service; we create a pseudonym for you by processing your IP address. We forward only this generated pseudonym to TrustPid. We do not enrich this pseudonym with your customer, browsing, traffic data or other information. Neither do we create a profile about your behavior on the individual online service. We only process your data if you have given consent for the stated purpose on the respective online service.

TrustPid uses the pseudonym generated by us to create the tokens which the partners then use to play out advertising and personalized product recommendations. TrustPid generates a different token for each partner for each individual user.

As a mobile customer of Telekom Deutschland GmbH, you can try out the TrustPid process for the duration of the test operation. Test participation is possible only after previous, voluntary, and explicit consent (known as the opt-in process). Please note that consent must be provided separately on each of a partner’s participating website. You can manage your settings and preferences at any time via the data privacy portal on [www.trustpid.com](http://www.trustpid.com). You can revoke your previously given consent to data processing by Telekom Deutschland GmbH at any time in the data privacy portal. You have the option to [withdraw](#) consent to the creation of IDs for individual partners. You also have the option of completely deactivating the service. This revokes all previously given consent and the TrustPid service can no longer be used for your mobile phone number until you activate it again. Further information is available on the official TrustPid site at [www.trustpid.com](http://www.trustpid.com)

-Data privacy information last revised May 03, 2023 .