



Data privacy information Deutsche Telekom IoT GmbH („Telekom“) for IoT hardware Ecosystem and the IoT Solution Optimizer

The protection of your personal data has a high priority for the Deutsche Telekom IoT 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 the IoT hardware Ecosystem and the IoT Solution Optimizer hereinafter referred to as the digital service:

- **Project data:** Deutsche Telekom collects the performance metrics regarding users' projects in the IoT Solution Optimizer upon user's explicit permission by acceptance of Terms & Conditions. The analysis algorithms do not include any private data associated with your user accounts or their association to project data. The project data is used for the purpose of improving the IoT Solution Optimizer web service, as well as in trend analyses of M2M or IoT product designs, or their aspects. Upon the expiration or deletion of the user's account, the personal data is automatically erased from the system and the project data is being anonymized. It is not possible to correlate anonymized data to a specific user account.
- **Personal data:** Data such as contact details, being your
 - First name and last name,
 - e-mail,
 - postal address,
 - company name

are collected for the users who have registered to the IoT Solution Optimizer. These data are collected directly from the users upon registration and completion of the user profile and are solely used for access to the service and user administration purposes. The personal data is deleted 28 days after deactivation of a user account. The deletion request can also be triggered at any time by the user under "My Account -> Settings". In this case, the user directly gets deactivated and afterwards also deleted.

Web contact form: Data such as

- First name and last name,
- e-mail,
- postal address,
- company name

are collected from users who requested support or information on particular components of the service. The data that is requested via web contact forms is used solely for the purpose of processing the request and providing the support. a. Web contact form data is deleted after 1 year.

Processing in the provision of the digital service that is carried out on the basis of legitimate interest (Art. 6 para. 1 f GDPR, §25 para. 2 no. 2 TDDDG)

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

The logged data is used exclusively for data security purposes, in particular to defend against attacks on our server. They are neither used for the creation of individual user profiles nor passed on to third parties and will be deleted after 7 days at the latest. We reserve the right to statistically evaluate anonymized data sets.

Data control of the social media plug-ins used or links to social media platforms

Some pages contain buttons from social media networks (such as Facebook, Google, Instagram, X [Twitter], Pinterest, Xing, TikTok or LinkedIn) with which you can recommend the offers of the Deutsche Telekom IoT GmbH to your friends and acquaintances. Our web portal does not use any social-media plug-ins.

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 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. 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 access to 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	Mandatory when logging in
Processing company with company address/data recipient	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Products used/short description of the service used	Cookie: .AspNetCore.Session
Description of specific processing purpose	Session management
Responsibilities	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Processed data	Cookie
Storage period	Session
Legal basis (Processing)	Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG
Third country processing	--
Legal basis (Third country processing)	--

Processing purpose according to consent category	Mandatory when logging in
Processing company with company address/data recipient	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Products used/short description of the service used	Cookie: ARRAfinity
Description of specific processing purpose	Session management
Responsibilities	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Processed data	Cookie
Storage period	Session
Legal basis (Processing)	Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG
Third country processing	--
Legal basis (Third country processing)	--

Processing purpose according to consent category	Mandatory when logging in
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Processing company with company address/data recipient	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Products used/short description of the service used	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Description of specific processing purpose	Session management
Responsibilities	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Processed data	Cookie
Storage period	Session
Legal basis (Processing)	Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG
Third country processing	--
Legal basis (Third country processing)	--

Processing purpose according to consent category	Mandatory when logging in
Processing company with company address/data recipient	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Products used/short description of the service used	Cookie: ApplicationGatewayAffinityCORS
Description of specific processing purpose	Session management
Responsibilities	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Processed data	Cookie
Storage period	Session
Legal basis (Processing)	Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG
Third country processing	--
Legal basis (Third country processing)	--

Processing purpose according to consent category	Mandatory
Processing company with company address/data recipient	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Products used/short description of the service used	Cookie: .AspNet.Consent
Description of specific processing purpose	Website operation
Responsibilities	Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn
Processed data	Cookie
Storage period	1 year
Legal basis (Processing)	Art. 6 para. 1b GDPR, §25 para. 2 no. 2 TDDDG
Third country processing	--
Legal basis (Third country processing)	--

Analytical:

These processing's are necessary for us to carry out technical analyses, usage evaluations and reach measurements, with which we can ensure the quality and services offered and improve structural defects of the digital service and its functions. The necessary analytical processing is carried out without access to your terminal device and is based on information already collected for the provision of the digital service, see functionally necessary processing. The data is stored for 1 month and then anonymized. Further processing is done exclusively for the purpose of ensuring a high-quality and service-oriented service implementation. The legal basis for this processing is Art. 6 (4) GDPR. After anonymization, it is no longer possible to correlate any data to a specific user account.

Where can I find the 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);
- 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);
- 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;
- 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 e.g., 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 that we commission to process data within the scope provided for by law, Art. 28 GDPR (service providers, vicarious agents). In this case, Deutsche Telekom remains responsible for the protection of your data. In particular, we commission companies in the following areas: IT, sales, marketing, finance, consulting, customer service, human resources, logistics, printing.

To **cooperation partners** who provide services for you on their own responsibility or in connection with your telecom contract. This is the case if you commission services from such partners with us or if you consent to the involvement of the partner or if we involve the partner on the basis of a 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 other European countries (Netherlands and France).

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 Deutsche Telekom IoT GmbH, Landgrabenweg 149, 53227 Bonn, Germany. 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 11.04.2025