

PRIVACY POLICY of Makedonski Telekom AD - Skopje

1. General Information on the Personal Data Controller and the Personal Data Protection Officer

Controller: Makedonski Telekom, Joint Stock Company for Electronic Communications – Skopje (Makedonski Telekom, MKT)

Headquarters: Kej 13-ti Noemvri No. 6, 1000 Skopje, Republic of North Macedonia

MKT Personal Data Protection Officer:

Makedonski Telekom, in accordance with the law, has appointed a person – Personal Data Protection Officer who is authorized to act in activities and procedures related to processing and protection of personal data.

You can contact the MKT Personal Data Protection Officer through the following communication channels:

E-mail: dpo@telekom.mk

Phone: 02/ 3242-763

2. Scope and Content of this Policy

This Policy contains information related to the collection and processing of personal data from natural persons - data subjects, which are collected, stored and processed by Makedonski Telekom AD -Skopje, as follows:

- Principles relating to processing and protection of personal data
- Categories of personal data processed by MKT;
- The purposes for which the processing of personal data is performed,
- The legal basis for the processing of personal data;
- Recipients or categories of recipients of personal data;
- Transfer of personal data to third countries, if any;
- How long do we store your personal data;
- The rights of the customers as data subjects in the processing of personal data;

3. What is our approach to the personal data of our customers?

Makedonski Telekom (MKT) as a personal data controller pays great attention to respect for privacy and protection of personal data. MKT processes personal data that are collected from the data subjects. In order to be a trustworthy personal data controller, we pay special attention to the protection of personal data in every segment of our business processes by implementing international and national standards for protection of personal data.

MKT is committed to ensuring the protection of your personal data in accordance with the Law on Personal Data Protection (hereinafter: LPDP), the bylaws of the Agency for Personal Data Protection and the internal acts of MKT, while also applying in its operations the Deutsche Telekom Group guidelines and standards based on the relevant European regulatory framework for personal data protection (GDPR).

4. Principles relating to processing and protection of personal data

All employees and hired persons who process personal data at MKT are obliged to respect the principles relating to protection of personal data, as follows:

4.1. Lawful, fair and transparent manner of processing of personal data

The personal data are collected and processed exclusively for the purposes defined in the relevant law, for the performance of a contract concluded with MKT and collection of payments for used services or purchased products, based on a prior consent obtained from the customer regarding the processing of their personal data for the purposes stated therein (e.g. Direct marketing), as well as in the event of a legitimate interest.

4.2. Limitation of the purpose of processing of personal data

MKT only processes the personal data for purposes required for compliance with the legal obligations, exercise of rights and obligations under the concluded contracts and collection of its claims, as well as for purposes for which the customer has given prior consent. If MKT has a legitimate interest to pursue processing of personal data for other purposes, such processing will be subject to analysis and assessment of the impact that it might have on the privacy of the customer.

4.3. Limiting the scope of personal data (Data minimization)

The processing of personal data is limited to only those data that are necessary to fulfil the purpose of the processing.

Should the need for additional data processing arise, MKT will inform the customer as a data subject about the need to submit additional data and, where necessary, ask for his/her consent for such additional processing.

4.4. Accuracy of personal data

Providing true, accurate and complete data, as well as timely information on changes of personal data is a legal and contractual obligation of the customers, as well as a necessary condition for establishing a subscriber relationship and exercising the rights and obligations arising from the subscriber agreement.

MKT has a legal obligation to keep accurate records of its customers, which is why it takes reasonable measures to confirm the accuracy of personal data and rectify and/or erase incorrect or incomplete personal data. In addition to the measures taken by MKT, every customer has the right to request rectification, change or erasure of his/her personal data in an easy and simple manner as laid down in item 10 of this Policy.

4.5. Limiting the storage periods for processing of personal data

The personal data obtained from the customers on the basis of a concluded subscriber agreement or during the activation of electronic communication service for which conclusion of a subscriber agreement is not required (prepaid services) are stored by MKT for the periods defined in the relevant law (e.g., Law on Electronic Communications).

After the expiration of the respective periods or after the fulfilment of the purpose for the processing, the personal data are erased from the MKT record system.

Depending on its needs, MKT may also process data for statistical or other business purposes in the longer period, as long as such data are anonymized and can neither be linked to a specific data subject nor contain any personal data.

4.6. Integrity and confidentiality of personal data

MKT takes appropriate technical and organizational measures to protect the personal data from unauthorized access, illegal disclosure, alteration or destruction. The access to the personal data is

restricted to persons authorized to process personal data in accordance with their job descriptions, as well as to carry out activities required for the compliance with the legal obligations, contract performance, processing based on a given consent or legitimate interest.

4.7. Accountability

MKT, in accordance with the principle of accountability laid down in the LPDP, keeps records and evidence that all necessary measures have been taken to implement the above principles in practice, i.e., that MKT complies with the legal requirements for personal data protection.

5. Categories of personal data that are subject to processing

MKT collects, stores and processes all personal data that are determined by law as well as any data necessary for performance of the contract concluded with MKT (e.g. for provision of the service for which the subscriber agreement has been concluded and collection of payments for the rendered services).

5.1. Personal identification data of the data subject

- name and surname,
- address of residence (including address for installation of equipment and address for delivery of products/monthly bills, if different from address of residence),
- personal identification number (PIN),
- contact information (email, phone number)
- profession

Note: MKT does not collect or process special categories of personal data such as data on racial or ethnic origin, political opinions, religious or philosophical beliefs or trade unions membership, as well as genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation;

5.2 Additional data required for concluding and performing a contract

MKT obtains these personal data from the data subjects for the purposes of concluding a contract or during the duration of a concluded contract and it processes them for precisely defined purposes, as follows:

- Ability to pay assessment data (such as data concerning the employment status or acquired pension right, data obtained from the Macedonian Credit Bureau on the basis of prior consent, payment history of MKT bills)
- payment history data (transaction account, data from a payment card that the subject voluntarily saved in an appropriate payment application, etc.)

5.3. Data regarding generated communication traffic:

This type of data is processed when using public electronic communication services from MKT for the purposes of enabling and transferring the established communication, as well as collecting payments for the rendered services.

These include the following types of data:

- data required to monitor and identify the source of the communication;
- data required to identify the destination of the communication;
- data required to identify the date, time and duration of the communication;
- data required to identify the type of the communication;
- data required to identify the communication equipment through which the communication was established;

- data required to determine the location of mobile communication equipment;
- data on communication traffic generated through public electronic communication network such as call duration, number of SMS messages, number of calls, amount of internet traffic and number of internet sessions, etc.)

Note: MKT does not collect, store or process data related to the content of the realized communication, which is confidential and secret in accordance with the law. Interception and surveillance of the content of the communications can be performed only by a competent state authority in a procedure provided by law;

6. Purposes of processing of personal data

6.1. Ability to pay assessment

Prior to concluding a contract with a person who is not a customer, MKT may process personal data by obtaining a report from authorized entities that process data for the purpose of determining creditworthiness (Macedonian Credit Bureau) in order to make an ability to pay assessment of that person and the type of services that can be offered to that customer. MKT performs such verification on the basis of an appropriate consent obtained from the data subject. Furthermore, when making an ability to pay assessment, MKT may request the data subject to submit a certificate of employment or a document determining the existence of retirement status from a person who wants to conclude a new contract with MKT for the use of services and/or procurement of products or in case of an existing customer, MKT may use the data available to determine the ability to pay and the timely payment of the monthly bills to MKT.

In case of an existing customer of MKT services, before concluding the contract, MKT may process the data available in its own records related to determining their ability to pay, if such data are still stored in accordance with the storage periods determined in the adequate regulations.

In case of established low ability to pay that does not guarantee timely and full payment of the monthly bills, MKT may recommend use of services on the advance payment principle (i.e., prepaid services) or another tariff model adequate to the ability to pay assessment of the data subject.

6.2. Establishing subscriber relation and contract performance

In order to perform the scope of the contract concluded with a data subject, MKT processes the personal data and/or the data on generated communication traffic for the following purposes:

- Installation/intervention on a connection or equipment for providing the service or for product delivery;
- Provision, i.e., use of the agreed electronic communication services;
- Response to a filed complaint/grievance from a customer about the amount of the bill or the quality of the services;
- Provision of customer support, i.e., customer care services and measuring the customer satisfaction;
- Fulfilment of the obligations from issued guarantee for the purchased product;
- Debt collection based on the monthly bills for the rendered services;
- Notifications that MKT submits to its customers related to the use of the services (e.g., notification for increased use of services, sending reminders for payment for the services, notification that the customer is in roaming, etc.),

6.3 Preventive activities for protection against damages and fraud

MKT processes the personal data of the customers and the data on the generated communication traffic in order to protect itself and its customers from damages or to prevent frauds related to:

- Misuse of other people's personal data
- Misuse of the services or the given access to the communication network of MKT for purposes that are contrary to the concluded contract
- Protection of the customers against excessive and atypical traffic volume

6.4 Submitting information to the competent authorities

MKT processes the personal data of the customers and the data for the generated communication traffic in order to be able to provide information at the request of the state authorities within their authorizations given by law, such as Courts, Public Prosecutor's Office, state agencies (AEC, SMI, etc.) or to provide information to persons with public authority (lawyers, notaries, collection officers) related to the implementation of the adequate legally prescribed procedure for debt collection.

6.5. Processing of personal data based on obtained consent

If the processing is not performed for the purpose of fulfilling the legal obligations or performance of a contract, MKT may process personal data based on a consent obtained from the relevant data subject.

Such processing is performed to fulfil the purposes for which such consent was given, such as the following activities:

- ✓ Direct marketing

Based on this consent, MKT processes personal data (name, surname, address, e-mail address, telephone number and data on communication traffic and the manner of use of the services) for the purpose of sending advertising content, promotions, offers of products and services from the current MKT portfolio, wherein, in order to fulfil this purpose, MKT also performs automatic processing of data related to a certain customer, i.e., profiling of data such as the tariff model the customer uses, their behaviour when using the services in terms of the manner of use of certain communication services, scope/volume of used services, etc. MKT performs direct marketing related profiling in order to be able to offer the customer a service, additional package or tariff model that will be relevant to them, i.e., that will meet their customer needs, the manner and the scope/volume of use of certain types of services provided by MKT and that will enable optimal use of the services and meet their needs. For example, if the customer uses the envisaged volume of internet traffic included in their tariff, MKT can offer them a tariff with larger volume of internet traffic or an additional internet package with which they will be able to continue using the data services, i.e., the internet.

The consent for direct marketing is optional, and the customer is entitled to withdraw it at any time, in a simple manner and free of charge, as stated in Article 6.6 below.

- ✓ Telephone directory

Based on this consent, MKT processes the personal data of the customer - natural person (name and surname, address of residence), together with their subscriber number by publishing them in the public Telephone Directory, in order to make the data of that customer publicly available so that they can be contacted.

The consent to be included in the public Telephone Directory is optional, and the customer is entitled to withdraw it at any time, in a simple manner and free of charge, as stated below.

- ✓ Ability to pay assessment via Macedonian Credit Bureau

Based on this consent, MKT processes the personal data of the customer - natural person (name and surname, address of residence and PIN) in order to obtain a report on their ability to pay assessment from the Macedonian Credit Bureau - a joint stock company which in accordance with the law is authorized to

collect and process data on indebtedness and regularity in settling of the liabilities of natural persons and legal entities.

MKT uses such data to assess the ability to pay and the credit exposure of a certain customer when concluding a new contract, activating a new service or purchasing a certain product and based on these data, it can suggest to the customer an alternative way of using the MKT services or refuse the sale of a certain product in instalments, as explained in Article 6.1.

6.6 Channels for giving and withdrawal of consents

The individual customer can give and withdraw the consents in several ways, as follows:

- When concluding a subscriber agreement, the customer makes their choice regarding the requested consents and their choice is entered in the MKT record system, and the selected values (yes or no) together with an adequate description of each consent are given in a separate annex to the agreement.
- At any time after concluding the agreement, the customer can make a change, i.e., give or withdraw a certain consent through one of the following channels:
 - 1) Through login in and verification of a customer on a special module on the website of MKT - telekom.mk which can be accessed also through the MyTelekom application, where the customer can change the consents of their choice;
 - 2) By submitting an adequate form in writing published on the MKT website in the nearest MKT store or at the e-mail address dpo@telekom.mk;
 - 3) By calling the MKT Contact Centre at the telephone number 122.

6.7 Automated processing of the customer data - profiling without additional consent

Profiling is any form of automated processing of personal data for the purpose of assessing certain personal aspects, preferences and interests of a particular data subject.

In addition to the automated processing of customer data for direct marketing purposes that MKT performs based on the customer's consent, as described above, in certain cases, MKT performs processing of personal data through profiling in order to comply with the legal obligations, e.g., if a competent state authority requests data from MKT under a procedure defined by a law or if it is necessary to make a proper decision upon a customer complaint.

In addition, this type of data processing is conducted for the purposes of performance of a contract concluded with MKT for providing the contracted services to the customer or collection of outstanding monthly bills. For example, to inform you that the validity of a certain package expires or that a certain volume of traffic has been used, to inform you about your unpaid bill or to inform you that you have switched to roaming, i.e., that your mobile phone is logged on to a foreign network.

In certain cases, MKT processes the customer data both on the basis of a legitimate interest and in order to protect the customer against unnecessary costs. For example, if the customer switches to roaming, we remind them that there is a possibility to activate a certain roaming package, which allows them to optimize their costs when using the services abroad, i.e., in roaming or in order to make an analysis of the traffic volume generated over a certain time (i.e., rapid increase of the traffic volume) and inform the customer in order to protect MKT and the customer against fraud, misuse or huge bill for the customer.

7. How do we store your personal data?

MKT has implemented adequate technical and organizational measures to protect the personal data from unauthorized access, unauthorized disclosure or possible misuse. Our employees are trained to work in accordance with the legal provisions for personal data protection and the internal acts for personal data protection and are obliged to comply with them. Every person who has access to your personal data is

obliged to protect the secrecy of the data and to act in accordance with the instructions of MKT in accordance with the applicable legal regulations for personal data protection.

Only persons authorized by MKT are entitled to access your personal data, to the extent necessary to carry out their work tasks or engagement.

Every authorized person who has access to your personal data signs a statement committing themselves to secrecy and protection of the personal data during their processing.

The personal data processed by MKT are stored on servers located at the MKT headquarters, but also on a server in an EU member state, based on a concluded contract.

Neither MKT, nor the processors, will forward your data for use to any third parties, unless you have provided your explicit consent in that regard, or unless there is such legal obligation or based on the concluded contract with MKT.

8. Transfer of personal data to third countries

Considering that MKT is part of the Deutsche Telekom Group, the personal data of the customers can be transferred to some of the companies within the Deutsche Telekom Group for the purposes of providing technical services or resources. Furthermore, in order to realize certain business relationship related to the provision of services to the customers, MKT may hire personal data processors that are located outside of the territory of the Republic of North Macedonia (e.g. manufacturers and maintainers of software solutions used by MKT or for measuring customer satisfaction, etc.). When transferring personal data, a high level of technical and organizational measures are taken to ensure the confidentiality and the protection of personal data by using standard personal data protection clauses approved by the European Commission.

If the transfer takes place in countries outside the European Union or the European Economic Area, the transfer will take place only if the legal requirements are met.

9. Processing of personal data by third parties

All trade companies that are partners of MKT and conduct processing of personal data of MKT customers as part of their engagement and business relationship are obliged to apply adequate technical and organizational measures to ensure personal data protection; furthermore, with each partner MKT has concluded an appropriate agreement defining the purpose and the manner of processing of personal data as well as the type of personal data which the partner processes.

(For example – in order to be able to deliver the product you have ordered online, or to provide the installation of the necessary infrastructure and equipment in your home, or to deliver your monthly bill, or to remind you that the bill has not been paid, or to initiate a forced collection procedure).

10. How long do we store your personal data?

We store your personal data for the periods prescribed by law and our internal acts, for a period of time that is necessary to fulfil the relevant purposes.

- The personal data of the customers that are entered in MKT records system based on a concluded subscriber agreement (Postpaid services) are stored for the entire duration of the subscriber relationship and for a period of one additional year from the date of issuance of the last monthly bill (invoice) to the customer for the provided services, i.e. the termination of the subscriber relationship.
- The personal data of the customers that are entered in MKT records system based on the use of Prepaid services without concluding a subscriber agreement are stored for the entire duration of the validity of the SIM card and one year after the deactivation of the SIM card.
- The data for the generated communication traffic are stored for a period of 12 months from the date of the communication, in order to ensure the availability of such data for prevention or detection of criminal offences, for conducting criminal procedure or when that is required in the

interests of the security and defence of the Republic North Macedonia, as well as for initiating a procedure for forced debt collection.

- The data on issued monthly bills are stored for a period of 10 years after the end of the year in which they were issued.

After the expiration of the storage periods, the personal data are deleted from the records. In certain cases and for certain types of data, instead of erasing the data, MKT can anonymize the personal data to a level that makes it impossible to connect the data to any customer i.e. data subject, whereby the processing of personal data will stop. MKT can use such anonymized data for the preparation of business analysis or for statistical purposes (e.g. for network planning, traffic volume forecasting, etc.)

Note: Please note that notwithstanding the fulfilment of the above conditions, MKT will not erase your personal data if:

- You have an outstanding debt based on a subscriber agreement for which a procedure for forced debt collection has been initiated and MKT will process such data until the completion of the debt collection procedure.
- You have filed a complaint within the legal deadline, until the final completion of the complaint procedure in accordance with the applicable regulations.
- There is another type of ongoing court procedure, until its final completion.

11. What are your rights?

Under certain conditions laid down by law, you have the right of access, rectification, erasure, restriction of processing, personal data portability, right of complaints, right not to be subject to a decision based on automatic data processing, and right of withdrawal of consent. These rights arise from the LPDP.

Right of information (Articles 17 and 18 of the LPDP)	We have an obligation to inform you what kind of data we collect about you, what are the purposes of processing your personal data, how long we store them and whether we disclose them to any third parties.
Right of access (Article 19 of the LPDP)	At your request, we have an obligation to provide you with detailed information about the kind of data we process about you. The Request to Access to Personal Data template is published on the following link
Right to rectification (Article 20 of the LPDP)	At your request, we will correct or supplement your incorrect or incomplete data. The Personal Data Rectification Request template is published on the following link
Right to erasure (Article 21 of the LPDP)	At your request, we will delete the data: if the purpose for which they were processed has been fulfilled; if you have withdrawn the consent for processing; if the data have been unlawfully processed; if you have objected to the processing or for compliance with the legal obligation to erase the data when there is no other legal ground for the processing. The Personal Data Erasure Request template is published on the following link

<p>Right to restriction of processing (Article 22 of the LPDP)</p>	<p>At your request, we will restrict the processing of your personal data: if you contest the accuracy of the personal data, for a period enabling MKT to verify the accuracy of the personal data; if you believe that processing is unlawful but you oppose the erasure or if you require the data for the exercise of legal claims.</p> <p>The Request to Restrict the Processing of Personal Data template is published on the following link</p>
<p>Right to data portability (Article 24 of the LPDP)</p>	<p>At your request, we will transfer your personal data in a structured, commonly used and machine-readable format. This right is applicable where the processing of personal data is based on a consent or on a contract and where the processing is carried out by automated means.</p> <p>The Personal Data Portability Request template is published on the following link</p>
<p>Right to complaint (Article 25 of the LPDP)</p>	<p>Based on your complaint, we will stop the processing of the data if the legal grounds for their processing is in our legitimate interest or for statistical purposes, provided that your right to privacy overrides our interests and purposes.</p> <p>The Complaint template is published on the following link</p>
<p>Right to withdrawal of consent (Article 11 of the LPDP)</p>	<p>When the legal ground for processing of your personal data is a given consent, if such consent is withdrawn, we will stop processing the data for the purposes for which the consent was given.</p> <p>The given consents can be withdrawn at any time, free of charge through one of the channels listed in item 6.6 of this Information.</p> <p>The withdrawal of the consent will not affect the lawfulness of the processing of personal data that was performed based on a consent before its withdrawal.</p> <p>The template of the Statement for giving or withdrawing consent is published on the following link</p>

Makedonski Telekom AD - Skopje will provide you with information on the actions taken based on your requests without undue delay and in accordance with the deadlines stipulated in the Law on Personal Data Protection.

If you consider that the processing of your personal data by MKT is not in accordance with the provisions of the LPDP or you consider that any of your rights to personal data protection has been violated, you have the right to lodge a complaint with the Agency for Personal Data Protection as competent body for supervising the lawfulness of the actions taken during the processing of personal data on the territory of the Republic of North Macedonia.

You can download the request at the following link:

https://www.dzlp.mk/sites/default/files/u4/baranje_za_utvrduvanje_na_prekrsuvanje_na_zzlp.docx

12. Publication and modification of this Privacy Policy

MKT may modify and amend this Personal Data Privacy Policy, when necessary or in the event of modification or amendment of the legal provisions.

The valid version of the Privacy Policy will always be published and publicly available on the website of Makedonski Telekom AD - Skopje – telekom.mk.

Date of the latest version of this Privacy Policy: 27.07.2023 in Skopje

Translated by Lingva Ekspert