



Makedonski Telekom AD – Skopje

## PRIVACY POLICY OF MAKEDONSKI TELEKOM AD – SKOPJE ON MOBILE APPLICATIONS

Makedonski Telekom AD – Skopje assigns a great significance to the protection of your personal data. We always inform you about the type of personal data that we collect, the manner in which your data are being used and the manner in which you can have an impact on this process.

### 1. Which data are recorded, how they are used and for how long they are stored

- a) **Upon registration or sign-in:** upon registering in an online Telekom profile or signing in the application, the following data are processed:
- a. Username (e-mail) and password *or*
  - b. Mobile number (MSISDN) and one-time password (OTP)

These data are required for registering in a unique online Telekom profile, user identification, presentation of adequate user information and data and providing a personalized user experience in the application.

- b) **When using the application:** after successfully signing in, the following data are processed in the course of the process of using the application:
1. Sign-in token and session token for being continuously signed in the application
  2. MSISDN-s and identification designations for fixed and mobile services managed by the user through the application
  3. Other data pertaining to the contractual conditions for the services, such as: type of service, date of conclusion of the contract, validity of the contract, terms and conditions for using the service, etc.
  4. Other data pertaining to the use of the application, such as: manner of signing in, app version, operating system, device, etc.
  5. IP address and other technical data.

The afore-stated data are required for the following purposes:

- the application provides the user with a one-stop shop for independently monitoring and managing the services and the connections enabled by Makedonski Telekom;
- the application enables Makedonski Telekom to maintain contact with its users via tools for user assistance and support;
- the user is informed through the application about relevant offers and the possibilities for obtaining such offers via the user experience in the application; the users receive through the application relevant information on the services managed thereby, such as: a new account, information on outstanding bills, etc.

- c) **User surveys/user feedback:**

This application uses the service provided by Medallia for user survey purposes. The application assessments and your feedback may be subject to a survey. The opinions of our users and their proposals for improvement provide us with substantial assistance in terms of improving our application. In order to conduct the Medallia surveys, we use push notifications that are sent to the users for accessing a particular survey. Such survey may be rejected and cancelled at any time. When filling in a survey, various types of information are transmitted to Medallia. This includes user information (telephone number, user number, etc.), feedback entered by the user, the versions of your device and operating system and similar information. We store and analyze the data for a period of 12 months. The responses are sent only after you complete the survey.

- d) **Conversation with an agent:** if you engage in a conversation with an agent (text conversation) on this page in order to contact the customer service, at the moment of starting the conversation various types of information are sent to the agent regarding the services. This includes information on signing in, user information (telephone number, user number and the latest conversation history) and the issue regarding which you requested assistance on the page, the versions of your device and operating system and similar information. The conversation platform provided by the data processor LivePerson or any other conversation platform provided by a third party also regularly transmits information regarding the availability of the conversation. This information is used for activating or deactivating the start button for initiating a conversation on the page. The data are kept for two years after the end of the interaction.
- e) **Text messages:** if you are using text messages in order to contact the customer service, at the very first contact various types of information are collected. This includes, for example, you mobile telephone number, your name and surname and the nature of your request. The processing takes place via the internal conversation platform of Makedonski Telekom and the commissioned processor, i.e. LivePerson, or any other conversation platform provided by a third party commissioned by Makedonski Telekom. The data are kept for two years after the end of the interaction.

## 2. Payments

The application offers a possibility for the users to pay their monthly bill or make a top-up with a credit or debit card (Visa and MasterCard) which has a three-digit security code. In that case, the user is redirected towards the Payment Gateway of the Braintree processing centre, where the user enters the payment card data thereof and then forwards the transaction to Bankart, the processing centre of NLB Banka. In the event of an electronic payment of bills, Makedonski Telekom does not have any access to the data related to your payment card or bank account since such data are entered directly in Braintree and then forwarded to Bankart and the bank through a secure connection. The only piece of information visible to Makedonski Telekom is the name and surname stated on the user's payment card, the invoice number and the amount of the completed transaction.

## 3. Authorizations

In order for the application to be able to operate on your device, access is required to various device features and data. To that end, you need to grant particular consents and authorizations related to information.

The authorizations are usually programmed by various manufacturers. Individual authorizations may, for instance, be combined into authorization categories and you may grant your consent solely for a particular authorization category as a unit.

Remember that if you reject to grant your consent to one or more authorizations you may not have access to the entire range of features offered by our application.

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

### **Location information**

The application may request access to information on your current location so as to send you relevant offers and notifications. In addition, Makedonski Telekom uses such information in an anonymous form in order to observe the network quality and improve the services that it provides. In terms of the offers, the information is not downloaded and stored on the servers of Makedonski Telekom or its commissioned processors; rather, only information on the real time location of the device is used. As regards observing the network quality, the location information is sent to Makedonski Telekom solely in an anonymous form, i.e., not a single user identifier is connected to such information. The data on the location for marketing purposes are collected from your device solely when you have granted your consent on receiving personalized offers and notifications and when you have given an approval on your device.

### **Contacts/directory**

The application may request access to contacts/directory in order to personalize your list of services. This information is neither sent nor stored on the servers of Makedonski Telekom.

### **Internet communication**

The application requests access to Internet via a Wi-Fi network or a mobile data network for real time updates related to your use of the provided services.

### **Camera**

The application may request access to you camera in order to scan the QR codes so as to facilitate the payment of bills. Permission to use the camera is requested only upon the initial attempt of the user to scan a bill. This information is neither sent nor stored on the servers of Makedonski Telekom or of the contracting partners thereof for the purposes of data processing.

### **Photographs/Media/Databases/Storage**

The application may request access to photographs/media/databases/storage for the purposes of downloading and storing PDF invoices and other relevant databases. Such authorizations are necessary if the user is required to perform the respective action. The afore-stated information is neither sent nor stored on the servers of Makedonski Telekom or of the contracting partners thereof for the purposes of data processing.

#### **4. Does the application send automatic (push) notifications?**

Push notifications are messages sent by the application to your device and displayed with the highest priority. As a standard, this application uses push notifications regarding information related to a contract (and based on services). The push notifications are adjusted to your profile if you have granted your consent during the installation of the application or upon its initial use. You may deactivate the push notifications at any time in the settings of your device. The data are processed by the commissioned data processor MoEngage.

## 5. Will my user habits be analyzed for marketing, monitoring or any other purposes?

### Explanations and definitions:

We want you to enjoy using both our application and our products and services. We analyze your user habits in order to find products that would interest you and adjust the application to the users. Either we or the companies commissioned by us for the purposes of data processing create user profiles to the extent allowed by law. This information cannot be directly connected to you.

The following information is aimed at providing you with general information on the various data processing purposes. You may alter the settings in terms of data privacy so as to grant your consent to the use of the tool or you may accordingly reject its use. The tools which are strictly necessary for enabling the application may not be rejected.

### **Improving the technical quality of the application (strictly necessary)**

In order to measure the quality of the application programming and identify any downtimes and the reasons thereof, analyses are conducted of the programme order and the user habits. These analyses are used for the purposes of the continuous development and improvement of the experience when using the application.

### **Profiles for user-centric display of the application (consent-based)**

In order to continuously improve the application, we also engage in monitoring events. This comprises monitoring your navigation in the application. The analysis of such navigation provides us with insight into the application use patterns, which enables us to detect any problematic user experiences and accordingly improve the application.

### **Profiles for personalized recommendations (consent-based)**

Makedonski Telekom provides personalized recommendations about products or services. The service provider creates a pseudonymized profile for events based upon your activities in the application (such as, based on the services and the pages you have visited) and it assigns profile categories. The system displays content or information suitable for your profile.

### **Profiles for participation and data processing in the Loyalty Programme (consent-based)**

Makedonski Telekom provides an opportunity to its users to participate in the Loyalty Programme and to win prizes through the application. Under this consent, the personal data of our users are collected and processed in order to improve and enhance the Loyalty Programme.

#### **a) Strictly necessary tools**

These tools are indispensable in order to enable navigating the application and using its main features. They enable the main features, such as access to protected areas of the application, service management, performance of payments, etc.

Furthermore, we may use some of our tools in order to provide you with important information about the services that have an impact on your continuous use of the Telekom services, such as new bills, outstanding payments, new information on the services/fault reports that you have submitted, service interruptions, etc. In addition, some tools are activated when you are using additional features, such as

conversation with an agent. The technical analytical tools of the internal platforms are indispensable since they enable us to conduct a technical analysis and measure the performance; we constantly use them for the purposes of developing and improving the application for your benefit.

Company	Purpose	Storage period	Country of processing
MoEngage	Push messages in the application/inbox for the purposes of providing information about individual services, such as new information on fault reports, service interruptions, etc.	120 days as of the latest activity in the application	India
Deutsche Telekom Digital Labs	Push messages in the application/inbox for the purposes of providing information about individual services, such as new information on fault reports, service interruptions, etc.	24 months	India
LivePerson	Chat	24 months	USA
Deutsche Telekom Digital Labs	Technical analytics	24 months as of the latest activity in the application	India
Medallia	Survey	12 months	USA

b) External analysis tools (consent-based)

These tools help us better understand how our application is being used. We use analysis tools, for example, in order to determine the number of individual users of a particular application and analyze the habits in terms of using the application and the interactions of the users, based upon anonymous and pseudonymized information, which is then used in order to improve the understanding of the users' needs.

Company	Purpose	Storage period	Country of processing
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Google (Google Analytics / Firebase)	Analysis of the use of the application and the products for a reliable experience	26 months / 14 months	USA
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**c) Marketing and other tools (consent-based)**

These tools are used for ensuring personalized and, thereby, relevant contents regarding the products and services offered by Makedonski Telekom and for measuring the effectiveness of the information related to them. If you disable the marketing tools you will still be able to view the same number of notifications, but they may be less relevant for you.

Company	Purpose	Storage period	Country of processing
MoEngage	Push marketing messages, inbox for marketing notifications	120 days as of the latest use of the application	India
Deutsche Telekom Digital Labs	Marketing messages in the application, inbox for marketing notifications	24 months	India

**6. Where can I find information that matters to me?**

This information on data privacy provides an overview of the items that pertain to Makedonski Telekom in terms of the processing of your data in this application.

Additional information, including information on data protection in general, as well as on specific products, is available at <https://www.telekom.com/en/corporate-responsibility/data-protection-data-security/data-protection> и <https://www.telekom.com/en/deutsche-telekom/privacy-policy-1744>.

**7. Who is responsible for the data processing? Who should I contact if I have any questions regarding data privacy at Makedonski Telekom?**

Makedonski Telekom has the capacity of a data controller. If you have any questions, please contact our customer support at [info@telekom.mk](mailto:info@telekom.mk).

**8. What are my rights?**

You have the right to:

- a) request information about the affected personal data categories, the purposes of the processing, all the data recipients and the foreseen storage period;

- b) request rectification or completion of any inaccurate or incomplete data;
- c) withdraw your consent at any time which shall apply in the future;
- d) dispute the data processing based upon legitimate interests, due to reasons related to your specific situation;
- e) request the deletion of your data in particular cases pursuant to Article 17 of the General Data Protection Regulation, especially if the data are no longer necessary for the purposes for which they were collected or if they have been illegally processed or if you have withdrawn your consent pursuant to item (c) or you dispute the processing as per item (d) above;
- f) under particular circumstances, request a restriction related to the data where it is impossible to delete them or when the deletion obligation has been disputed;
- g) data transferability, i.e. you may obtain the data you have submitted to us in a commonly used, machine-readable format, such as CSV, wherein you may, when necessary, transfer such data to other persons;
- h) file a complaint regarding the data processing to the responsible supervisory body (Personal Data Protection Agency).

#### **9. To whom may Makedonski Telekom transfer my data?**

Processors, i.e. companies engaged for the purposes of data processing in accordance with Article 28 of the General Data Protection Regulation (service providers). In that case, Makedonski Telekom is still responsible for the protection of your data. We commission companies especially in the following areas: IT, sales, marketing, finance, consulting, client services, etc.

These are cooperation partners which, at the risk thereof, provide services for you or in relation to your contract with Makedonski Telekom. This applies if you order services from these partners through us, if you have granted your consent to the participation of the partner or if we involve a partner based upon a legal permit.

Due to legal obligations, in certain cases we have a legal obligation to provide particular data to any state authorities that have requested such data.

#### **10. Where are my data being processed?**

Your data will be processed in Macedonia and in other European countries. If, in exceptional cases, your data are processed in countries other than members of the European Union (i.e. third countries), the following shall take place:

- a. if you have granted your explicit consent to such processing (in most countries outside of the EU, the level of data protection does not meet the EU standards); this especially applies to the right to comprehensive monitoring and control by the state authorities, such as in the USA, which disproportionally hinders the protection of the data belonging to European citizens;
  - b. to the extent indispensable for the provision of services for you
  - c. or to the extent required by law.
- b) Furthermore, your data will be processed in third countries if, under particular relevant measures, adequate level of data protection may be ensured (e.g. a decision on compliance adopted by the EU Commission or adequate guarantees).

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Translated by Lingva Ekspert