



PRIVACY POLICY of Makedonski Telekom AD – Skopje

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

Controller: Makedonski Telekom AD – Skopje, Joint Stock Company for Electronic Communications - Skopje (hereinafter referred to as: 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 an appointed person - a personal data protection officer who is authorized to act in activities and procedures related to the processing and protection of personal data.

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

E-mail address: dpo@telekom.mk

Telephone: 02/ 3242-763

2. Scope and contents of the Policy herein

In this Policy you can find information related to the collection and processing of the personal data of natural persons - personal data subjects, which are collected, stored and processed by Makedonski Telekom AD - Skopje, as follows:

- Personal data processing and protection principles
- Personal data categories processed by MKT
- The purposes for which personal data processing is pursued
- The legal grounds for personal data processing
- The personal data users or user categories
- Personal data transmission to third countries, if any
- The storage period for your personal data
- The rights of the customers in the capacity of personal data subjects in terms of personal data processing

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

Makedonski Telekom (MKT), as a personal data controller, pays great attention to respecting privacy and protecting personal data. MKT processes the personal data that it receives from the personal data subjects. In order to be a trusted controller of personal data, we pay particular attention to the protection of personal data in every segment of business processes through the implementation of international and national standards for personal data protection.

MKT is committed to ensuring the protection of your personal data in accordance with the Law on Personal Data Protection (hereinafter referred to as: LPDP), the by-laws of the Personal Data Protection



Agency, MKT's internal acts, wherein, in its operations, it also applies the guidelines and standards of the Deutsche Telekom Group, which are based on the relevant European regulatory framework for the protection of personal data (GDPR).

4. Personal data processing and protection principles

Employees and engaged persons who process personal data at MKT have an obligation to comply with the principles of personal data protection, as follows:

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

The personal data are collected and processed exclusively for the purposes defined in relevant law, fulfillment of the subject matter of a contract concluded with MKT and payment for services provided or products purchased, based on consent obtained for the processing of personal data from the customers for the purposes specified therein (e.g. direct marketing) as well as in the event of a legitimate interest.

4.2. Limiting the purpose of personal data processing

MKT processes personal data only for purposes necessary to fulfill legal obligations, fulfill the rights and obligations arising from concluded contracts, collect its claims and processing for purposes for which the customer has given prior consent. If MKT has a legitimate interest in processing personal data for any other purposes, such processing will be subject to analysis and assessment of the impact of such processing on the privacy of the customers.

4.3. Limiting the personal data volume

The processing of personal data is limited only to such data that are necessary to fulfill the purpose of the processing.

If the need arises for processing additional data, MKT will inform the customer as a personal data subject about the provision of additional data and, where necessary, it will request the consent thereof for such additional processing.

4.4. Personal data accuracy

Providing true, accurate and complete data, as well as timely notification of any changes to the personal data, is a legal and contractual obligation of the customers and a necessary prerequisite for establishing a subscription relationship as well as for fulfilling the rights and obligations arising from the subscription contract.

MKT has a legal obligation to keep accurate records of its customers and, to that end, it implements reasonable measures to confirm the accuracy, rectify and/or erase any inaccurate or incomplete personal data. In addition to the measures taken by MKT, each customer has the right to request rectification, modification or erasure of their personal data in an easy and simple manner as set out in item 10 of this Policy.

4.5. Limiting the deadlines of personal data processing

MKT stores the personal data obtained from the customers based on a concluded subscription contract or upon activation of an electronic communication service by a specific person for whom the conclusion of a subscription contract is not foreseen (prepaid services) in accordance with the deadlines defined in the relevant law (e.g. the Law on Electronic Communications).



After the deadlines have expired or after the purpose of the processing has been fulfilled, the personal data are deleted from MKT's records system.

MKT may process data for statistical or other business purposes also in the longer term, according to its needs, but in doing so, such data are to be anonymized, after which such data cannot be linked to a specific personal data subject and do not contain any personal data.

4.6. Personal data integrity and confidentiality

MKT takes appropriate technical and organizational measures in order to protect the personal data from any unauthorized access, unlawful disclosure, alteration or destruction of the data. The access to the personal data is limited to persons authorized to process personal data in accordance with their job description and for activities necessary to implement legal obligations, fulfill a contract, processing based on consent or fulfilment of a legitimate interest.

4.7. Accountability

MKT, in accordance with the principle of accountability set out in the Law on Personal Data Protection, has in place records and logs that all necessary measures have been taken to implement the above-mentioned principles in practice, i.e. that it meets the legal requirements for the protection of personal data.

5. Personal data categories subject to processing

MKT collects, stores and processes the personal data determined as such by law as well as data necessary to fulfill the subject matter of the contract concluded with MKT (e.g. providing the service for which the subscription contract was concluded and billing for the services used).

5.1. Personal data for identification of the subject

- name and surname:
- residential address (including equipment installation address and product delivery address/monthly bills, if different from the residential address),
- personal identification number (PIN) of the customer,
- contact information (e-mail, telephone number),
- profession.

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

5.2 Additional data required for contract conclusion and performance

MKT receives such personal data from the personal data subjects for the purposes of concluding a contract or during the validity of a concluded contract and it processes them for precisely defined purposes, such as:

- data on solvency verification (such as data on employment or pension entitlement, data obtained from the Macedonian Credit Bureau based on prior consent, payment background related to MKT bills)
- data on the effectuation of payment (transaction account, payment card data that the subject voluntarily recorded in an appropriate payment application, etc.)

5.3. Data on generated communication traffic:



This type of data is processed when using public electronic communication services from MKT for the purpose of enabling and transmitting the established communication and billing for the services provided.

This includes the following types of data:

- data required for tracking and identifying the communication source,
- data required for identifying the communication destination,
- data required for identifying the communication date, hour and duration,
- data required for identifying the communication type,
- data required for identifying the communication equipment used for generating the communication,
- data required for identifying the location of the mobile communication equipment,
- data on generated communication traffic via a public electronic communications network, such as call duration, number of SMS messages, number of generated calls, amount of internet traffic and number of made internet sessions, etc.)

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

6. Purposes of personal data processing

6.1. Solvency verification

Before 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 purposes of determining the creditworthiness (Macedonian Credit Bureau) in order to determine the solvency of that person and the type of services that can be offered to thereto as a customer. MKT performs such verification based on the consent obtained from the personal data subject for this purpose. Also, when checking the solvency, MKT may request the submission of a certificate of employment or a document confirming the existence of pensioner status from a specific person who wishes to conclude a new contract for the use of services and/or the purchase of products with MKT or, in the case of an existing customer, to use the data available to MKT so as to determine the solvency and timeliness of the payment of monthly bills to MKT.

If it is an existing customer of the MKT services, prior to concluding the contract, MKT may process the data it has in its own records related to determining its solvency, if such data are still stored in accordance with the deadlines set out in the relevant regulations.

In the event of a determined low solvency that does not provide guarantees for a timely and full payment of the monthly bills, MKT may recommend the use of services based on the principle of payment in advance (i.e. prepaid services) or another tariff model appropriate for the solvency of the personal data subject.

6.2. Establishing a subscriber relation and contract performance

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

- Installation/intervention related to a connection or equipment for the provision of a service or for the delivery of a product
- Provision, i.e. use of the agreed electronic communication services



- Response to a complaint/appeal submitted by a customer regarding the amount of the bill or the quality of services
- Providing customer support services, i.e. customer care, and measuring the customer satisfaction
- Fulfillment of obligations under a warranty issued for a purchased product
- Debt collection based upon monthly bills for the services used
- Notifications that MKT delivers to its customers related to the use of services (for example, notification regarding an increased use of services, sending reminders for the payment for services, notification that the customer is in roaming, etc.),

6.3 Preventive activities for protection against damage and fraud

MKT processes the customers' personal data and the data on generated communication traffic in order to protect itself and its customers against any damage or to prevent any fraud related to:

- Misuse of third party personal data
- Misuse of the services or the access provided to the MKT communication network for purposes contrary to the concluded contract
- Protecting the customers against any excessive and atypical traffic volume

6.4 Submission of information to competent authorities

MKT processes the personal data of the customers and the data on generated communication traffic to provide information upon request to state authorities within the framework of their authorizations granted by law, such as, for instance, courts, the Public Prosecutor's Office, state agencies (Agency for Electronic Communications, State Market Inspectorate, etc.) or in order to provide information to persons with public authorizations (lawyers, notaries, bailiffs) related to conducting an appropriate legally prescribed debt collection procedure.

6.5 Personal data processing based upon obtained consent

If the processing is not carried out for the purposes of fulfilling legal obligations or fulfilling a contract, MKT may process personal data on the basis of the consent obtained from the relevant personal data subject.

Such processing is carried out to fulfill 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 the communication traffic and the manner of using the services) for the purpose of delivering advertising content, promotions, offers of products and services from MKT's current offer, whereby, in order to fulfill this goal, MKT also performs automatic processing of data related to a specific customer, i.e. profiling of data such as the tariff model he/she is using, the behavior thereof when using the services in terms of the manner of use of certain communication services, the volume of services used, etc. MKT performs profiling related to direct marketing in order to offer the customers a service, an additional package or a tariff model that will be relevant thereto, that is, it will correspond to the customer needs thereof, the manner and scope of use of certain types of services provided by MKT and it will enable such customer to optimally utilize the services and satisfy the needs thereof. For example, if the customer uses the intended volume of internet traffic included in the tariff thereof, MKT may offer thereto a tariff with a larger volume of internet traffic or an additional internet package with which he/she will be able to continue using data transfer services, i.e. the internet.



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

✓ **Public directory**

Based on this consent, MKT processes the personal data of the customer - a natural person (name and surname, residential address), along with the subscriber number thereof, by publishing them in a Public Telephone Directory, in order for the data of that customer to be publicly available so that he/she can be contacted.

The consent related to the public directory is optional, wherein the customer is entitled to withdraw it at any time, in a simple manner and free of charge, as set out below.

✓ **Solvency verification through the Macedonian Credit Bureau**

Based on this consent, MKT processes the personal data of the customer – a natural person (name and surname, residential address and PIN) in order to obtain a report on the solvency thereof from the Macedonian Credit Bureau - Joint Stock Company, which, in accordance with the law, is authorized to collect and process data on indebtedness and regularity in settling the obligations of natural persons and legal entities.

MKT uses such data to assess the solvency and credit exposure of a particular customer when concluding a new contract, activating a new service or purchasing a particular product and based on this data, it may suggest to the customer an alternative way to use the MKT services or refuse the sale of a certain product in installments, as explained in Article 6.1.

6.6 Channels for granting and withdrawing consent

The granting and withdrawal of consent by an individual customer may be done in several manners, as follows:

- When concluding a subscription contract, the customer declares the choice thereof in terms of the requested consents and it is entered into the MKT recording system, with the selected values (*yes or no*) including an appropriate description of each consent being shown in a separate annex to the contract.
- At any time after concluding the contract, the customer can make a change, i.e. grant or withdraw a particular consent through one of the following channels:
 - 1) Through user login and verification on a special module on the MKT website – telekom.mk, which can also be accessed through the Moj Telekom application, where the customer him/herself can make changes to the consents according to the choice thereof;
 - 2) By submitting an appropriate written form published on the MKT website to the nearest MKT shop or to the e-mail address dpo@telekom.mk;
 - 3) By calling the MKT Contact Center on the telephone number 122.

6.7 Automatic processing of customer data – profiling without an additional consent

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

In addition to the automatic 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 to fulfill legal obligations, e.g. if an authorized state body requests data from MKT in a procedure established by law or if this is necessary to make a proper decision following a complaint from a customer.



Furthermore, this type of data processing is carried out for the fulfillment of a contract concluded between MKT, such as providing the agreed services to the customer or collecting the due monthly bills. For example – in order to notify you that a certain package is expiring or that a certain amount of traffic has been used up, to inform you about your unpaid bill, or to notify you that you have switched to roaming, i.e. that your mobile phone is registered to a foreign network.

MKT in certain cases processes customer data both on the basis of a legitimate interest and in order to protect the customer from any unnecessary costs. For example: - if the customer switches to roaming, we remind them that they have the option of activating a specific package intended for roaming traffic, which allows them to optimize costs when using services abroad, i.e. in roaming or analysis of the amount of traffic generated in a particular time (i.e. rapid increase in the amount of traffic) and its notification for the purpose of protecting MKT and the customer against any fraud, misuse or the occurrence of an excessively high bill for the customer.

7. How do we store your personal data?

MKT has implemented appropriate technical and organizational measures to protect the personal data against any unauthorized access, unauthorized disclosure or possible misuse. Our employees are trained to work in accordance with the legal provisions regarding the protection of personal data and the internal acts on the protection of personal data, and they are obliged to comply with them. Any person who has access to your personal data is obliged to protect the confidentiality of the data and to act in compliance with the instructions of MKT in accordance with the applicable legal regulations on the protection of personal data.

Only persons authorized by MKT have the right to access your personal data, to the extent necessary to perform their work tasks or engagement.

Every authorized person who has access to your personal data signs a statement committing to the confidentiality and protection of the personal data in the course of their processing.

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

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

8. Personal data transfer to foreign countries

Having regard to the fact that MKT is part of the Deutsche Telekom Group, the customers' personal data may be transferred to one of the companies within the Deutsche Telekom Group for the purpose of providing technical services or resources. In addition, in order to implement a certain business relationship related to the provision of services to the customers, we may engage personal data processors located outside the territory of the Republic of North Macedonia (e.g. manufacturers and maintainers of software solutions used by MKT or measuring customer satisfaction, etc.). When transferring personal data, a high level of technical and organizational measures are provided to ensure the confidentiality and protection of the personal data through standard clauses pertaining to the protection of personal data approved by the European Commission.

If the transfer is carried out in countries outside the European Union or the European Economic Area, the transfer will only be carried out if the legal conditions for its permissibility have been met.

9. Personal data processing by third parties

All companies that are partners of MKT and that process personal data belonging to the MKT customers within the framework of their engagement and business relationship are obliged to apply appropriate



technical and organizational measures that ensure the protection of personal data, wherein MKT has concluded an appropriate agreement with each partner, which establishes the purpose and manner of processing personal data, as well as the type of personal data that partner may process.

(for example – in order for us to be able to deliver the product you ordered online, or to provide the installation of the required infrastructure and equipment in your home, or to deliver your monthly bill, or to remind you that it 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 within the time limits prescribed by law and our internal regulations, for a period of time necessary to fulfill the relevant purposes.

- The personal data of the customers entered into the MKT records system based on a concluded subscription contract (postpaid services) are stored throughout the entire duration of the subscription relationship and for a period of one year from the date of issuance of the last monthly bill (invoice) to the customer for the services provided, i.e. the termination of the subscription relationship.
- Personal data of the customers entered into the MKT records system based on the use of prepaid services without concluding a subscription contract are stored throughout the entire validity period of the SIM card and one year from the date of deactivation of the SIM card.
- The data on the generated communication traffic are stored for a period of 12 months from the date of the communication, in order to enable the availability of such data for the purpose of preventing or detecting criminal acts, for the purpose of conducting criminal proceedings or when the interests of the security and defense of the Republic of North Macedonia so require, as well as for initiating proceedings for forced debt collection.
- The data on issued monthly bills are kept for 10 years after the end of the year in which they were issued.

After the expiration of the retention periods, the personal data are erased from the records. In certain cases and in terms of certain types of data, it is possible that instead of erasing, MKT may anonymize the personal data to a level that prevents the data from being linked to any customer or subject of personal data, thus ceasing the processing of personal data. MKT may use such anonymized data to prepare business analyses or for statistical purposes (e.g. for network planning, traffic volume forecasting, etc.).

Note: Please note that despite meeting the above conditions, we do not delete your personal data if:

- you have an outstanding debt based on a subscription contract for which a procedure for forced collection of claims has been initiated and we process them until the debt collection procedure is completed.
- you have submitted a complaint within the legal deadline, until the final completion of the complaint procedure in accordance with applicable regulations.
- conducting another type of court procedure, until its final conclusion.

11. What are your rights?

Under certain conditions set out by law, you have the right to access, rectify, erase, restrict the processing, portability of your personal data, the right to object, the right not to be subject to a decision based on automated data processing, the right to withdraw consent. These rights that you are entitled to arise from the Law on Personal Data Protection (LPDP).

Right to information (Articles 17 and 18 of the LPDP)	We have an obligation to inform you what data we collect about you, for what purposes we process them, how long we keep them, and whether we disclose them to any third parties.
Right to access (Article 19 of the LPDP)	<p>Upon your request, we are obliged to provide you with detailed information about the data we process about you.</p> <p>The Request for Access to Personal Data form is published at the following link</p>
Right to rectification (Article 20 of the LPDP)	<p>At your request, we will rectify or supplement your inaccurate or incomplete data.</p> <p>The Request for Rectification form is published at the following link</p>
Right to erasure (Article 21 of the LPDP)	<p>At your request, we will delete the data: if the purpose for which they were processed has been fulfilled; if you have withdrawn your consent to the processing; if the data have been unlawfully processed; if you object to the processing or in order to comply with a legal obligation to delete the data when there is no longer a legal basis for the processing. The Request for Erasure form is published at the following link</p>
Right to restriction of processing (Article 22 of the LPDP)	<p>At your request, we will restrict the processing of personal data: if you dispute the accuracy of the personal data, for the period until we have verified their accuracy; if you consider the processing to be unlawful but oppose the erasure or if you need the data to exercise legal claims.</p> <p>The Request for Restriction of Processing form is published at the following link</p>
Right to data portability (Article 24 of the LPDP)	<p>At your request, we will transfer your personal data to you in a structured, commonly used and machine-readable format. This right is applicable when personal data are processed on the basis of consent or contract and when the processing is carried out by automated means.</p> <p>The Request for Portability form is published at the following link</p>
Right to object (Article 25 of the LPDP)	<p>Based on your objection, we will stop processing the data if the legal basis for their processing arises from our legitimate interest or statistical purposes, provided that your right to privacy prevails over our interests and purposes.</p> <p>The objection form is published at the following link</p>
Right to withdrawal of consent (Article 11 of the LPDP)	<p>In cases when the legal basis for processing your personal data arises from granted consent, we will cease processing such data for the purposes for which consent was given, provided it is withdrawn. The consents given can be withdrawn at any time, free of charge, through one of the channels specified in item 6.6 of this Information.</p> <p>The withdrawal of consent does not affect the lawfulness of the processing of personal data that was carried out on the basis of the consent before its withdrawal.</p> <p>The form for the Statement on granting or withdrawing consent is published at the following link</p>



Makedonski Telekom AD - Skopje will provide you with information about the activities undertaken based on your requests without any undue delay and in accordance with the deadlines set out in the Law on Personal Data Protection.

If you believe that the processing of your personal data by MKT is not in accordance with the provisions of the Law on Personal Data Protection or you believe that any of your rights to personal data protection have been violated, you have the right to submit a request to the Personal Data Protection Agency as the competent authority for supervising the legality of the activities undertaken in 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_prekrshuvanje_na_zzlp.docx

12. Publishing and amendments to this Privacy Policy

MKT may change and supplement the Policy on Personal Data Privacy herein as necessary or in the event of any changes in 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 – www.telekom.mk.

3. Final part This Policy will enter into force on the date of its adoption and it will begin to be applied upon its publication on the MKT portal. The document herein supersedes the previous version of POL 008 Privacy Policy and the Guidelines on Personal Data Protection adopted on 6.12.2024.

3.1. References

- Law on Personal Data Protection (Official Gazette of the Republic of North Macedonia No. 42/20) and Law Amending the Law on Personal Data Protection (Official Gazette of the Republic of North Macedonia No. 294/21)
- Law Amending the Law on Personal Data Protection (Official Gazette of the Republic of North Macedonia No. 101 dated 21.5.2025)

Approved by:

Chief Executive Officer

Nikola Ljushev



Translated by Lingva Ekspert