



# General Data Privacy Information of Telekom Deutschland GmbH („Telekom“)

## General

Telekom attaches great importance to protecting your personal data. We inform you what personal data we collect, how your data is used, and the options available to you.

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

This General Data Privacy Information provides an overview of the aspects that generally apply to the processing of your data by Telekom.

Additional information on data privacy associated with the use of our products, particularly regarding the intended purpose, deletion periods etc., can be found in the data privacy information for that particular product at [www.telekom.de/datenschutzhinweise](http://www.telekom.de/datenschutzhinweise) and in the Telekom Shop.

## On what legal basis does Telekom process my data?

We process your data in line with the regulations of European and German data privacy laws (the regulations cited below refer to the EU General Data Protection Regulation, GDPR), i.e. only to the extent that and insofar as

- it is necessary for performance of a contract with you or to carry out steps at your request prior to entering into a contract (Art. 6 sec. 1b GDPR) or
- you have given your consent to the processing of your data (Art. 6 sec. 1a GDPR) or
- processing is necessary in order to protect our own or third party legitimate interests, e.g. in the following cases: to assert claims, to defend our interests in lawsuits, to recognize and eliminate misuse; to prevent and investigate criminal offenses; to ensure secure IT operations at Telekom; consulting services (consulting companies); (Art. 6 sec. 1f GDPR) or
- for compliance with legal requirements, e.g. the retention of documents for commercial and fiscal purposes (Article 6 sec. 1c GDPR), or where it is in the public interest (Article 6 sec. 1e GDPR) or
- the processing for another purpose occurs in order to anonymize data so that the personal reference is dropped (Art. 6 sec. 4 GDPR)

## What are my rights?

You have the right

- a. to demand information regarding the categories of data being processed, the purpose of processing, the recipients of the data, and the planned duration of data storage (Art. 15 GDPR);
- b. to demand the rectification or completion of inaccurate or incomplete data (Art. 16 GDPR);
- c. to withdraw your consent at any time with future effect (Art. 7 sec. 3 GDPR);
- d. to object to data processing on the basis of a legitimate interest based on your particular situation (Art. 21 sec. 1 GDPR);
- e. in specific cases as outlined in Art. 17 GDPR, to demand the erasure of data, particularly where the data is no longer necessary for the intended purposes, or was processed unlawfully, or you have withdrawn your consent in accordance with (c) above, or have objected to data processing in accordance with (d) above;
- f. under certain circumstances, to demand the restriction of data processing, to the extent that erasure is not possible, or the obligation to erase data is disputed (Art. 18 GDPR);
- g. to data portability, i.e. you may receive your disclosed data in a commonly used, machine-readable format, such as CSV, and where applicable, transmit it to others (Art. 20 GDPR);
- h. to complain to the competent supervisory authority (for telecommunications contracts: the Federal Officer for Data Privacy and Freedom of Information; in other cases: the North Rhine-Westphalia Commissioner for Data Protection and Freedom of Information (LDI NRW).

## Does Telekom carry out risk assessments and does it work together with credit agencies, for example Schufa?

Telekom carries out a risk assessment before concluding a contract if it is to provide services that will only be remunerated later. The purpose of this is to protect against payment defaults. For this check, we use data about you and payment experiences from existing contracts, also with other companies of the Telekom Group. This includes information such as your name, address, date of birth and customer number, the term of your contracts, your order history, payment transactions and sales figures. If information from our group is not sufficient for a check, we also obtain information from credit agencies and debt collection companies. For this purpose, we transmit to them the name, address, date of birth and IBAN. If we receive data from credit agencies or debt collection companies, we also use scoring if necessary. This calculates the probability that a customer will meet his or her payment obligations in accordance with the contract. Scoring is based on a mathematically and statistically recognised and proven procedure.

We save the results of a credit check for one year. Article 6 (1 b) GDPR set out the legal basis for these forms of data processing.

We collaborate with the following credit agencies and debt collection companies:

SCHUFA Holding AG; CRIF GmbH; Creditreform Boniversum GmbH; Creditreform Bonn Domschke & Rossen KG; Bisnode Deutschland GmbH; EOS Deutscher Inkasso-Dienst GmbH; KSP Kanzlei Dr. Seegers; Dr. Frankenheim Rechtsanwaltsgesellschaft mbH; Sirius Inkasso GmbH; Inkasso Tesch Forderungsmanagement GmbH; Intrum Deutschland GmbH; Phillips & Cohen Associates (Deutschland) GmbH.

We also transmit to SCHUFA Holding AG and CRIF GmbH personal data collected within the framework of the contractual relationship regarding non-contractual or fraudulent behaviour (so-called negative data). This data is used by the credit agencies both for the purpose of checking creditworthiness and for fraud prevention.

Furthermore, so-called positive data, i.e. information on undisturbed ongoing contractual relationships (application, execution and termination of the same) are exchanged with CRIF GmbH. This data is used exclusively for the purpose of fraud prevention (e.g. prevention of orders without payment intention or detection of identity theft).

SCHUFA Holding AG and CRIF GmbH process the data received and also use it for the purpose of scoring in order to provide their contractual partners in the European Economic Area and in Switzerland as well as, if applicable, other third countries (insofar as an adequacy decision of the European Commission exists with regard to these) with information on, among other things, the assessment of the creditworthiness of natural persons. The so-called positive data are used exclusively to create scores for fraud prevention.

In addition to the above, SCHUFA supports its contractual partners by profiling them to identify conspicuous circumstances (e.g. for the purpose of fraud prevention in the mail order business). For this purpose, enquiries from SCHUFA's contractual partners are analysed in order to check them for potential anomalies. This calculation, which is carried out individually for each contract partner, may also include address data, information as to whether and in what capacity an entry exists in generally accessible sources for a public figure with matching personal data, as well as aggregated statistical information from the SCHUFA database. This procedure has no effect on the credit assessment and credit scoring at SCHUFA.

The legal basis for the aforementioned data processing is Article 6 (1) f DSGVO.

Further information on the activities of SCHUFA and CRIF can be found at [www.schufa.de/datenschutz](http://www.schufa.de/datenschutz) and [www.crif.de/datenschutz](http://www.crif.de/datenschutz) respectively.

**Will my data be used for advertising or market research purposes?**

We will use your personal data for advertising or market research purposes if you have given your consent; you may withdraw your consent at any time for the future. The opportunity of withdrawing your consent is also pointed out to you when we obtain it.

Alternative provisions apply when you are online, so when you are surfing our website or using our apps. Information on the relevant provisions can be found in the data privacy information for the respective online services.

**Who does Telekom share my data with?**

With so-called commissioned data processors, i.e. companies we have contracted to process data within the relevant statutory framework, see Article 28 of the GDPR (assistant, auxiliary persons). In these cases, Telekom is still responsible for protecting your data. We subcontract to companies mainly in the following areas: IT, sales, marketing, finance, consulting, customer service, human resources, logistics, printing.

With cooperation partners who provide services on your behalf or in conjunction with your Telekom contract at their own responsibility. This applies if you have requested the services of such partners from us, or if you consent to the involvement of a partner, or if we involve the partner on the basis of a lawful permit.

On the basis of our statutory legal obligations: In selected cases, we are legally obliged to transmit certain data to the requesting government agency. Example: Upon presentation of a court order, we are obliged under § 101 of the German Copyright Act (Urheberrechtsgesetz) to provide the owners of copyrights/ancillary copyrights with information about customers who have allegedly offered copyrighted works via Internet file sharing services. Telekom additionally seeks cooperation with other service providers (e.g. Smart Home Services). If you are also a user of these services, you can connect your respective account with them. You must carry out this connection separately for each service. As soon as you have carried out a connection, the personal data that is listed in these data privacy notes can be used from your respective account for the appropriate service. The relevant service provider will inform you about the processing of your personal data.

**Where is my data processed?**

Your data will be processed in Germany and Europe.

Partially your data is processed in countries outside of the European Union (so-called third countries), for the time being e.g. Storage /hosting of customer data (except for traffic data) through Amazon web services EMEA SARL, Microsoft Ireland Operations Ltd and Salesforce.com Germany GmbH in Europe. Only administrator-accesses within the framework of a technical support are possible from USA.

If any other data processing takes place in a third country this will be because you have given your explicit consent, or because it is necessary for performance of our contract with you, or because the law so permits (Art. 49 GDPR). Above and beyond this, your data will only be processed in third countries provided certain measures are taken to ensure an adequate level of data privacy (for example, an adequacy decision by the EU Commission or appropriate safeguards, Art. 44ff. GDPR, [\(see here\)](#)).

**Where can I find further information regarding data protection at Telekom?**

Further information, including data protection information for specific products, is available at [www.telekom.de/datenschutzhinweise](http://www.telekom.de/datenschutzhinweise) and at [www.telekom.com/datenschutz](http://www.telekom.com/datenschutz).

**Who is responsible for data processing? Who should I contact if I have any queries regarding data privacy at Deutsche Telekom?**

The controller is Telekom Deutschland GmbH, Landgrabenweg 151, 53227 Bonn, Germany. If you have any queries, please contact our Customer Services department or our Data Protection Officer, Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn [datenschutz@telekom.de](mailto:datenschutz@telekom.de)

This translation is intended solely for informational purposes; the original German text shall be legally binding.

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