

**Owner**  
Head of Corporate Affairs

**Approval Date**  
2019-03-13

**No.**  
T 4063-11 Uen

**Version**  
6

**Security**  
Public

**Approved by**  
Board of Directors

**Related**  
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## **Group Policy - Privacy and Data Protection**

### **1 PURPOSE**

The purpose of this policy is to set high and consistent Telia Company standards to respect privacy and data protection. In Telia Company we recognize that privacy is important for our employees, customers and other stakeholders and we are committed to respect and safeguard their privacy.

The primary objective of this Policy is to ensure that natural persons that Telia Company interact with feel confident that Telia Company respects and safeguards their privacy. The second objective is to reduce legal and regulatory risks as well as reputational and brand exposure in this respect. Telia Company is a telecom operator managing significant networks and data volumes and we therefore aim to ensure network integrity and data security to protect privacy.

More detailed requirements regarding the implementation of this Group Policy are presented in a separate instruction "Group Instruction – Processing Personal Data". The security measures to safeguard privacy and protect personal data are presented in the "Group Policy Security" and in related Group Instructions.

It is Telia Company's objective to live by the letter and spirit of the law. Any obligations and regulations in the laws that may impose stricter rules or additional limits concerning processing of personal data shall remain unaffected by this policy.

The type of personal data Telia Company collects about natural persons, when Telia Company collects it and how Telia Company processes it, may be further regulated in conjunction with particular services and in the contractual terms for the respective services or otherwise by local legislation.

The latest version of this Group Policy is published on [www.teliacompany.com](http://www.teliacompany.com).

### **2 PRINCIPLES**

The following principles shall apply for the activities under this Group Policy:

- Use best practice in each market to inform customers that Telia Company is collecting and processing their personal data, explain how this data will be used as well as outline their rights.
- Be transparent and informative about personal data processed about employees in Telia Company, so that employees understand how their data is used and outline their rights related to this data.
- Process personal data only if the processing relies on legitimate processing criteria. Ensure the correct legal ground for processing data for each specific purpose is used in each specific case. Telia Company shall ensure all data subjects are well informed in a proactive manner about all different processing purposes that Telia Company undertakes with collected personal data.
- If consent is used as legal ground for processing of personal data it shall be unambiguous, informed and allowing customers to withdraw their consent. If legitimate interest is used as legal ground, data subjects shall be sufficiently informed about such purpose and be allowed to object in a user friendly matter.

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- Collect only personal data that is relevant and not excessive in relation to the purpose for which it is collected and only collect it for explicit and legitimate purposes.
  - Process personal data fairly and lawfully in all operations including when processing such data outside the country where it has been collected. Process personal data only to the extent necessary for explicit purpose applicable for that processing, while always paying attention to the protection of individuals' privacy and to interests of special user groups such as children. Processing of personal data should be limited to what is needed for operational purposes, employment matters, efficient customer care and relevant commercial activities, including the processing of anonymous user patterns.
  - Not retain personal data longer than is legally required or necessary for each explicit and legitimate purpose that the data is processed for. When personal data is no longer necessary to fulfil the explicit purpose in question, which legitimised its original collection and processing, we shall permanently delete such data.
  - Keep personal data accurate and reasonably up-to-date. Provide user friendly measures for data subjects to obtain information and copies about the personal data processed about them and to correct inaccuracies.
  - Only provide personal data to authorities to the extent required by law or with the data subject permission and in accordance with predefined approved processes.
  - On a regular basis assess privacy risks associated with the processing of personal data and develop appropriate mitigation strategies to address these risks.
  - Require suppliers, in line with the level of protection in this Group Policy, to exercise special care to prevent loss, theft, unauthorised disclosure or inappropriate use of personal data collected by Telia Company. Expect suppliers to process such data fairly and lawfully in all operations, including when such data is processed outside of the country where it was collected or received.
  - Protect, with appropriate technical and organizational measures, personal data as well as messages and related information that are transferred in Telia Company networks and communications services as well as information concerning the location of a subscription or terminal device.
  - Identify and address the impacts of this Group Policy in change, development and procurement activities and embed privacy safeguards into design of our products, services, processes and infrastructure from the earliest stage of development covering the entire life cycle ('privacy by design').
  - Expect every Telia Company employee to respect duty of confidentiality by law and written agreements regarding non-disclosure.
  - Govern and manage privacy within Telia Company so that legal, contractual and business requirements are fulfilled and ensure that relevant and sufficient organizational resources are in place and secured to ensure proper implementation of this Group Policy and take corrective measures when necessary.

These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

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### **3 ROLES AND RESPONSIBILITIES**

This Group Policy applies to Telia Company AB and its Subsidiaries<sup>1</sup> and Joint Operations<sup>2</sup> as their own binding policy to all directors, members of the boards, officers and employees. In addition, Telia Company works towards promoting and adopting this Policy's principles and objectives in other associated companies where Telia Company does not have control but has significant influence.

Each Group Executive reporting to the CEO of Telia Company is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Policy.

Each country CEO is responsible for ensuring that all relevant entities within the CEO's geographic location has adopted and implemented this Group Policy.

### **4 BREACHES AGAINST THE POLICY**

Any Telia Company employee who suspects violations of the Code of Responsible Business Conduct or this Group Policy must speak up and raise the issue primarily to their line manager, and secondly to the Human Resources department, to the Ethics and Compliance Office, or through the Speak-Up Line. The Speak-Up Line is available on Telia Company's internal and external webpages.

Telia Company expressly forbids any form of retaliation for people who speak up. For specific requirements, please see our Group Instruction - Speak Up and Non-Retaliation.

Violations against this Group Policy can lead to disciplinary action, up to and including termination.

### **5 EXEMPTIONS**

A Subsidiary-specific corresponding policy shall be compliant with this Group Policy while adapting to the concerned business activities, local laws, local circumstances and language. If a deviation or exemption from this Group Policy is deemed necessary, the Country CEO shall escalate the matter to the Group General Counsel.

### **6 GROUP GOVERNANCE FRAMEWORK**

This Group Policy is part of the Group Governance Framework, which includes without limitation:

- a) Code of Responsible Business Conduct, Purpose and Values, Strategy, Group Policies, and Instructions for the CEO as approved by the Board of Directors;
- b) Decisions made by the CEO, the Delegation of Obligations and Authority as approved by the CEO, Group Instructions as approved by the CEO or by the responsible Head of Group Function; and
- c) Guidelines, best practices, process descriptions, templates or working routines developed within the area of responsibility of Head of Group Function.

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<sup>1</sup> All entities over which Telia Company AB has majority control.

<sup>2</sup> The joint operations over which Telia Company AB has joint control and management responsibility.