

Creator
Heidi Westman**SUPPLIER PRIVACY NOTICE**

This notice applies to the personal data of natural persons working for our suppliers or acting as agent or representative of our suppliers (“you”, “your”).

Suppliers are understood as any third party (such as consultant or vendor) that provides goods or services to Telia Company.

In Telia Company we recognize that privacy is important to our suppliers and we are committed to respect and safeguard their privacy.

This Privacy Notice contains overall information regarding what personal information we process about you, for which purpose, with whom we share it, why we are allowed to process it, how long we store it and what rights you have.

We have developed this Supplier Privacy Notice (Privacy Notice) to:

- Demonstrate Telia Company’s commitment and accountability to protect and respect your fundamental rights to data protection and privacy,
- Explain how we collect, use and safeguard your personal information, and
- Help you to understand what rights you have.

When processing your personal information, we comply with applicable legislation and the mandatory regulations and instructions issued by the competent authorities.

1. How do we collect your personal data?

The personal data we collect is in general provided by our suppliers. However, it may also be necessary to process personal data that we receive from publicly available sources, other companies, authorities or other third parties, such as credit agencies and fiscal authorities etc. This may include personal data that we receive through our established whistle-blower channels in relation to possible compliance violations or as part of compliance investigations.

2. Why do we process personal data, what is the legal basis for it and how long do we process it?

Personal information means any information that (i) directly identifies an individual, or (ii) can be used in combination with other information to identify an individual. Anonymous information, namely information which does not relate to an identified or identifiable natural person or personal data rendered anonymous in such a manner that the data subject is not or no longer is identifiable, is not considered personal information.

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The primary reason we process your personal data is to approve, manage, administer or effect an agreement between Telia Company and the supplier you represent or work for. In this respect, we use your personal data, i.e. to organize our sourcing activities, issue purchase orders, process payments, perform accounting, manage our contract or review the services or products you supply us with.

In addition, we process personal data to meet our legal obligations (such as record keeping obligations, screening duties of board members), as well as to manage our risks and operations (e.g. prevent and detect security threats, exercise or defend legal claims). More details are provided in the table below.

Your personal data will be used by Telia Company only in a manner consistent with the purpose for which we obtained it. Personal data will only be processed for as long as this is required for the purposes it was collected for, or for the time required or authorized by law.

See more detailed information in the table below.

- a. We have a **legal obligation** to process your personal data for the following purposes:

Purpose	The time we process the data	Data attributes
Accounting	The time frame stated in the local law of the country where the company has its registered office. For example, for a period of 7 years according to the Swedish Accounting Act.	<ul style="list-style-type: none">- Financial details,- Invoice information (traceable to an individual) including;<ul style="list-style-type: none">o Amounts invoiced,o Specification of services purchased.
Reporting to authorities e.g. fiscal authorities, supervisory authorities (meeting any legal	The time frame stated in the local law of the country where the company has its	<ul style="list-style-type: none">- Name (suppliers' employees),- Title,- Address,- Email,- Business telephone number, ("Contact details"),



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obligations we may have in respect of our suppliers).	registered office.	- Information needed for compliance and risk management.
Compliance (e.g. Anti-Money Laundering Directive).	5 years after the customer relationship has ended.	- Contact details, - Information needed for compliance and risk management.

- b. We have the right to process your personal data, necessary for **the performance of a contract** to which the supplier is a party, for the following purposes:

Purpose	The time we save the data	
Precontractual relationship	1 year after closed contract.	- Contact details, - Supplier price information (traceable to an individual e.g. sole trader).
Payment of invoices	2 years after payment.	- Contact details, - Invoice information (traceable to an individual), - Financial details.
Order management	1 month after order is complete	- Contact details, - Supplier contract invoice information (traceable to an individual e.g. sole trader) including; - Amounts invoiced, - Specification of services purchased.



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Contract management	During supplier relationship.	<ul style="list-style-type: none"> - Contact details, - Financial status, - Agreement.
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c. We have a **legitimate interest** to process your personal data to administer Telia Company's supplier relationships for the following purposes:

Purpose	The time we save the data	
Supplier relationship; - Contact records for suppliers' employees, - contracts, - assessment of supplier's performance - Due diligence, audits.	2 years after end of supplier relationship, 10 years after end of agreement, 3 years after creation, 3 years after creation.	<ul style="list-style-type: none"> - Name (Suppliers owners, board members, suppliers' employees) and other contact details, - Line management details, - Contact details, - Contact persons in case of emergency (for consultants), - Background check information (for consultants), - Contact details, - Information/surveys on performance of supplier, - Information needed for compliance and risk management, data about the owners of the supplier, supplier's directors and senior management, where this is publicly available. This will include details of company ownership, career information, potential conflicts of interest and any regulatory enforcement actions taken against them or companies with which they are associated.
Network and information security (Recording and retaining visitor logs on sites,	Video surveillance 60 days after visit, except otherwise requested by the police / public	<ul style="list-style-type: none"> - Contact details, - Recorded material on surveillance cameras, - User-ID, - Access and authorities,



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images recorded by security cameras in and around our premises in order to meet our internal various security standards and policies.	prosecutor and / or legal department (this will be the case if the recorded images show potential criminal activity or incidents), Access control system 1 year, security log, 1 year after creation.	- Log data.
Dispute resolution (exercise or defend legal claims).	10 years after the supplier relationship has ended.	- Contact details, - Agreement, - Information needed to manage the dispute.

3. How do we safeguard your data?

Safeguarding your personal data is of the utmost importance to us.

Telia Company continuously works to protect our suppliers' interests. Our security work embraces protection for personnel, information, IT infrastructure, internal and public networks, as well as office buildings and technical facilities. Special attention is given to information such as your personal data.

Our security work aims to balance risk exposure, business value, available technology, vulnerabilities, and threats in order to comply with applicable laws, regulations as well as with contractual demands.

Information security and ensuring appropriate protection of supplier data is vital for us. We strive to implement security measures to set appropriate level of protection of information and to prevent and detect disclosure of personal data to unauthorized parties.



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4. With whom do we share your personal information?

We may share your information with:

- **Telia Company group companies** within the limits of applicable law. Our group companies may only use your information for the purposes described above in this document.
- **Our subcontractors**
 - Telia Company external service providers that assist Telia Company to conduct its business, to perform its functions or to operate its systems (for example, IT support, accounts payable, finance) and undertaking data analytics to confirm information contained in invoices.
 - In case of troubleshooting, 3rd line support and maintenance of the service, these parts are located outside EU/European Economic Area. If we transfer your personal data this way, we will take the appropriate steps in line with applicable laws to ensure that your rights to privacy are continued to be protected.

We may also share your information:

- **In response to legal process or authority request** in order to comply with applicable law or court order or in connection with judicial proceedings or other legal process.

We also disclose data to competent authorities (e.g. to the police or emergency services) when required by law and always in accordance with strict predefined processes.
- **As required or otherwise authorized by law.**
- **In connection with business transfers** such as part of any merger, acquisition, sale of Telia Company assets or transition of service to another company.

Companies that perform these services may be located outside the European Union or the European Economic Area. If we transfer your personal data this way, we will take the appropriate steps in line with applicable laws to ensure that your rights to privacy and data protection are ensured.

Depending on the situation, Telia Company may rely on an adequacy decision of the European Commission (providing that the country of location of the relevant service provider offers an adequate level of data protection) or if no such decision exists, may use safeguards such as e.g. standard data protection clauses. To obtain a copy of the relevant safeguard (if applicable), please contact Telia Company's Group Data Protection Officer using the contact details found below in section 7.



5. What are your choices and rights?

You have different rights according to GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council). Depending on the situation, you may have the right to:

- obtain confirmation as to whether or not personal information concerning you are processed and, where that is the case, access to the personal data (Right of access).
- obtain the rectification of inaccurate personal information concerning you rectified or in some cases to have incomplete data completed by means of providing a supplementary statement (Right to rectification).
- obtain the erasure of personal information concerning you (Right to erasure).
- obtain restriction of processing when certain conditions apply (Right to restriction of processing).
- receive personal information concerning you that you have provided to us in a structured, commonly used and machine-readable format and have the right to also have this information transferred to another data controller (Right to data portability).
- object to the processing of your personal information in situations where the information is processed on a legitimate interest (Right to object).
- not be subject to a decision solely based on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (Right to not be subject to automated decision making including profiling).
- withdraw your consent at any time (Right to withdraw consent).

If you are concerned that Telia Company has not complied with this Privacy Notice or applicable privacy laws you may make a complaint to Telia Company, using the contact information below in section 7.

You also have the right to lodge a complaint with a supervisory authority of the member state of your habitual residence, place of work or the place of the alleged infringement. For instance, in Sweden you can lodge a complaint with the Swedish Data Inspection Board (Datainspektionen), www.datainspektionen.se.

6. How to find out about changes to this Privacy Notice?

We may need to update this Privacy Notice as our operations and services develop. You can see when it was last updated by checking the date displayed at the top of this notice. Please consider this uploaded version as the latest version.



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7. Controller of your personal data and contact information

Majority owned companies within the Telia Company group are controllers of your personal data and are therefore responsible for processing it in accordance with law.

We encourage you to contact us using the contact information provided below for any questions about this Privacy Notice or processing of your personal data:

Telia Company Group Data Protection Officer
dpo-tc@teliacompany.com

Telia Company AB
Info@teliacompany.com

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