

Telenet Privacy Policy

Welcome dear visitor, customer, user of Telenet products, interested reader: your privacy is important to you, and you are interested in our privacy policy. We at Telenet also attach great importance to your privacy, and do our utmost to deal with this in a caring and responsible manner. We also want to communicate clearly about this, which is why we have bundled together all the relevant information regarding the collection and use of your data (called 'personal data') in this privacy policy.

The collection and use of your personal data by Telenet take place in accordance with the applicable laws and regulations. This relates, in particular, to the General Data Protection Regulation, also known as GDPR¹, and other applicable legislation such as the Electronic Communications Act. In the legislation, the collection and use of your data is referred to as the 'processing of personal data'.

Good to know:

- Are you looking for privacy information about Safespot, TADAAM or BASE? Then you do not need to read any further here, because these products have their own privacy policies:
 - **Safespot:** [Safespot Privacy Policy](#)
 - **TADAAM:** [TADAAM Privacy Policy](#)
 - **BASE:** [BASE Privacy Policy](#)
- Telenet acts as reseller for certain products. In these cases, the supplier of the product is responsible for the processing, and has its own privacy policy. This means that the Telenet privacy policy does not apply to these products. This includes, for example, the smart lock of [Nuki](#) and the smart doorbell of [Ring](#).
- For the repair service for devices, Telenet does not act as a data controller. The repair is registered to the repairer, namely [Dynagroup](#), who is data controller and therefore responsible for processing the data you provide to them via their website in the context of the repair. The Telenet privacy policy is therefore not applicable.
- In case you buy a device in one of our stores and take out a loan for it, Telenet will collect data within the context of the application and granting of the loan on behalf of the lender [Cofidis](#). Telenet does not act as a data controller for this processing and the Telenet privacy policy is therefore not applicable.
- Cookies are also always processed in accordance with our privacy policy. For more information about cookies and how to manage your cookie preferences, please refer to our [Cookie Policy](#).

¹ GDPR = General Data Protection Regulation

What is covered in the privacy policy?

1. [Who are we?](#)
2. [Who is protected by this privacy policy?](#)
3. [Which personal data does Telenet process, and why?](#)
 - a. What data do we process?
 - b. How do we obtain this data?
 - c. Why do we process this data?
 - d. Summary table
4. [How do we protect your personal data?](#)
5. [Do we pass on your personal data? And to whom?](#)
6. [How long do we keep your personal data?](#)
7. [The use of your personal data for commercial purposes](#)
 - a. What levels of privacy are there?
 - b. How can you manage your privacy level?
8. [What are your privacy rights and how can you exercise them?](#)
 - a. Overview of your privacy rights
 - b. How can I exercise my privacy rights?
9. [How can I contact Telenet regarding my privacy?](#)
10. [Stay informed about changes](#)
11. [Escalation to the supervisory authority](#)

1. Who are we?

We are Telenet BV (with registered offices at Liersesteenweg 4, 2800 Mechelen, and registered with the KBO under number 473.416.418, hereinafter referred to as 'Telenet'). Telenet is a telecommunications company that, together with the BASE and TADAAM brands, among others, belongs to the larger Telenet group ('Telenet Group Holding SA/NV'). Telenet Group Holding SA/NV is fully-owned by Liberty Global.

We are responsible for the collection and use of your personal data, and we protect it with due care. We determine what data we collect and use, how we do this, and why. We also make sure we always do this in line with the applicable laws and regulations. We are the data controller.

2. Who is protected by this privacy policy?

Everyone who makes use of our products and services is protected by this privacy policy. By "everyone" we mean natural persons (not companies or offices) whose identity we know (you are identifiable, an individual).

We are thereby thinking of

- *Our customers;*
- *Family members of our customers if they also use the Telenet services;*
- *Our customers' visitors if they also use the Telenet services (such as the Telenet Hotspots in public spaces);*
- *Employees of our business customers who use the Telenet services;*
- *Our ex-customers;*
- *Potential future customers (prospects);*
- *The contact persons of our suppliers and partners;*
- *The contacts persons of our business customers;*
- *The contact persons of our customers, where applicable (e.g. guardian);*
- *Visitors to our shops and/or offices/business premises;*
- *Visitors to our websites;*
- *Users of our mobile applications (apps);*
- *Users of our forums (such as the Netwetters);*
- *Participants in competitions, campaigns, surveys, webinars, events, etc;*
- *Whistleblowers who contact us in relation to our whistleblowing policy.*

As a Telenet customer, it may happen that you allow family members, friends, visitors and employees to use the products and services of Telenet. An example is giving them access to your Wi-Fi. This will mean that Telenet processes their data, and this is therefore subject to the Telenet privacy policy. Telenet has no relationship with them, however, and consequently cannot notify them of this. We count on you, as a customer, to take your responsibility and inform them about this.

What about the personal data of children? If you or the person looking after you has created a profile on My Telenet, we will know your age. If you are younger than

16, you are automatically placed in the most protective privacy level, namely 'level 1 - General'. You can read more about the different privacy levels in [Chapter 7](#).

3. Which personal data does Telenet process, and why?

Telenet processes various categories of personal data for the exercise of its activities. In this chapter, we want to give you an insight into the categories of data we collect, how we obtain them and for what purposes we process them.

Depending on which Telenet service you use, we collect and use different types of personal data. Below, we describe what types of data these are, how we obtain them and why we collect and use them (we call these the 'processing purposes'). More information about the retention periods for this personal data can be found in [Chapter 6](#) of this privacy policy.

a. What data do we process?

The data we process can be divided into four types, namely user data, transactional data, derived data and sensitive data:

<p>User data</p> <p><i>This is data that is directly linked to your person, regardless of your products or services</i></p>	<ul style="list-style-type: none"> • Identification data: personal data that can identify you as a user of our products and services, such as your name and address, your date of birth, your ID card number, your national registry number, a copy of your passport or ID card, your photograph, your license plate (if you visit a Telenet office for instance), camera images if you visit a shop or our office, contact data: personal data that allows us to contact you such as your phone number, your e-mail address, etc.; • Contract data: personal data related to your contract, such as the products you have with us, your customer number, billing and payment data, contract and order confirmation, technical data such as personal data related to your devices, such as the model and number of your TV box, your IMEI number of your phone, etc.; • Your living and consumption habits: personal data that provide information about your living conditions, such as whether you have a dog, whether your children are still small, whether you like to travel, etc.; • Family data: data about your family composition, such as your marital status, your family members, etc.; • Financial data: bank account number, external credit rating, data relating to your financial position, e.g. homeowner, etc.; • Communication data: data relating to our communication with you, such as the interactions you have had with our customer service (via email, phone, live chat, social media...), audio recordings of customer service calls, etc.; • Your preferences: data relating to privacy level, choice of communication channels through which you want to be
--	--

	<p>contacted or not, settings on your TV box whether you want recommendations or not, etc.</p>
<p>Transactional data</p> <p><i>This is data that is linked to the use of your Telenet services and data that is created through your consumption of the Telenet services.</i></p>	<ul style="list-style-type: none"> • Technical data: the MAC address of your laptop, the software version on your phone with which you use one of our apps, etc.; • Traffic data: this is data that we need in order to transmit your communication (to handle traffic over electronic communication networks). Technical data and consumption data may also be included if they relate to your communication; • Location data: personal data that make it possible to determine the geographical position of your devices, such as GPS determination, connection to which transmitter mast or Wi-Fi point; • Consumption data: Personal data that our systems create when you consume our products. Such as: <ul style="list-style-type: none"> ○ When surfing (both fixed and mobile internet): the date, time, duration and location of an internet connection, the URLs you visit, as well as the internet volume consumed and the type of protocol or service (e.g. FTP, HTTP, Streaming, etc.); ○ Watching TV: For each TV box we keep a record of information such as which programs you watch, which films you watch and order from our TV library, what you record, what you pause, what you fast-forward or rewind, what your favorite TV channels are or which apps on our TV box you have recently used (both via cable and via our TV apps, both for live and near-live TV viewing, look-back TV and recorded programs); ○ When making telephone calls (both fixed and mobile): we process data relating to the telephone numbers, date, time, duration of a call, etc. • Data with regard to the content of your communication: such as the message you send in an SMS, a post you place on the Netwetters forum, the content of the telephone conversation you have, the e-mail you send or receive, the video you watch on a website, etc. Always with respect for the secrecy of telecommunications, of course; • Behavioral data: E.g. data about how you navigate the menu of our TV box . Data related to visiting our websites: via cookies, we collect certain data when you visit our website, such as your IP address, which page you are viewing, what you are putting in your Telenet shopping cart, etc. In addition, we also use cookies when you open our e-mails and when you use our apps (such as, for example, which software version you are using, the time and duration of the use of the app, your navigation through the app, etc.) For more information about cookies, we refer to the Telenet Cookie Policy.
<p>Derived data</p> <p><i>This is data that we derive from your user data and your transactional data.</i></p>	<p>Profiles: Based on your user data and transactional data, we are able to build up a profile of you. For example, if you use a lot of mobile data, we can deduce that you are a high user of mobile data. If you like to watch sports programs, this tells us that you are a sports fan. We also rate your Wi-Fi based on how well or poorly it works. Do you have children? If so, we can deduce that you are a family. We call the derivation 'high user', 'sports fan', 'Wi-Fi score' or 'family' profiles.</p> <p>These profiles are only created at the customer level, and not at the individual user level. This means that the profiles are created at the family level if you have a family subscription.</p>

	<p>We distinguish two types of profiles:</p> <ul style="list-style-type: none"> • Service type: these are only used for service reasons, such as network management analysis, technician planning, call center planning, input for customer care to further assist you with problems. For example, when an installation appointment is booked for you, you receive the profile 'Installation appointment scheduled'. Or when network measurements show that your modem is not functioning properly, your modem is given a bad score. • Commercial type: these are used to deliver the right advertising to the right target audience. For example, if, as a customer, you have a WIGO subscription without TV, then the profile is: "WIGOnoTV". It's possible that we will send you advertising for a TV subscription. You will not receive these advertisements if you have a WIGO subscription with TV, because you don't need them. Or if you or someone in your family regularly watches sports programs, you will be given the 'sports fan' profile. It's likely that you will be interested in advertising about the PlaySports TV pack. We also use these profiles in analyses with a commercial purpose e.g. to find out how much customers would be willing to pay for a new functionality, or to investigate why our customers leave Telenet. It's up to you to decide how personal our advertising and analyses may be, and which personal data we may use. You can manage this choice via your choice of privacy level. You can read more about this in Chapter 7.
<p>Sensitive data</p> <p><i>Some personal data is of a more sensitive nature and is additionally protected by privacy legislation</i></p>	<p>The privacy legislation places sensitive data in a separate category. This includes personal data related to your health, sexual preferences, political opinions, ethnic origin, religion, biometric data, criminal record, etc.</p> <p>With regard to biometric data (personal data resulting from specific technical processing relating to the physical, physiological, or behavioral characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as facial images or fingerprint data): In the context of identifying new customers in the online Telenet shop, we may use this by comparing facial images (selfies) with the photo on an identity document using image recognition software. This processing is only possible after your explicit consent. Biometric data will not be stored in our systems under any circumstances. In addition, we provide alternative identification processes if you do not wish to give your consent to the processing of biometric data.</p> <p>With respect to other types of sensitive data, the following applies: As a rule, Telenet does not collect or use this data. However, if you apply for a social tariff for health reasons, we are obliged to request a certificate concerning your medical condition to enable us to validate whether you are entitled to the social tariff. You may also be under guardianship. Telenet is notified accordingly so we can manage your contract with your appointed guardian.</p>

b. How do we obtain this personal data?

This can be done in various ways:

- We receive the data directly from you, e.g. when you conclude a contract, when you contact our customer service, take part in a competition, fill in a survey or a contact form, respond to a forum post, log on to the Wi-Fi hotspot, etc.
- We assign personal data to you for the use of our products and services, such as, for example, TV box number, e-mail address, IP address, telephone number, customer number, login code(s) and passwords.
- In addition, our systems register personal data that is generated during your use of our products and services such as, for example, the television programs you have watched, or the identification numbers of the devices linked to your Telenet internet connection.
- Finally, we also obtain personal data through third parties. Here are a few examples:
 - *We purchase data from specialized data companies to match with our own data (validate, supplement, correct...) to improve the quality of the data in our systems;*
 - *We buy data, such as your family composition and housing information, from specialized data companies (we call this socio-demographic data and consumer information);*
 - *We receive your interests via market research agencies (e.g. that you like to go to the movies);*
 - *We request creditworthiness analyses of prospects from specialized firms;*
 - *We obtain data on your mobile usage abroad from other telecom operators;*
 - *We obtain data from partners (e.g. if you have given your consent, your building contractor may send us your data);*
 - *We obtain data through affiliated companies within the Telenet group, e.g. in the context of an acquisition;*
 - *We obtain data from social media channels such as Meta, Google, etc. (e.g., when you use your social media profile to log in or when you contact us via this channel).*

c. Why do we process this personal data?

We process personal data for a variety of purposes, always using only the data that is necessary to achieve the purpose. We have listed the purposes below. We also explain the legal basis for collecting and using your personal data.

In general, we process your personal data when this is necessary:

- *in connection with the preparation, execution or termination of a contract;*
- *to comply with a legal obligation; and/or*

- *for the protection of our legitimate interests, in which case we will always try to strike a balance between that interest and respecting your privacy.*

If the processing of your personal data is not necessary for one of these three reasons, we will always ask for your consent to process your personal data. As a customer, you can manage your consent through your privacy level, see [Chapter 7](#) for more information.

The table below gives an overview of all the purposes and legal grounds on which we process your personal data.

Purposes	Description	Legal basis
Sales After-sales service Customer support	When you decide to become a customer of Telenet, we will ask you for some personal data, such as your name, address, telephone number, e-mail address, for the management of our contractual relationship. We also read your ID card, take a copy of your foreign passport if you don't have a Belgian ID card, or we take a copy of your ID card if you conclude a credit agreement. We also assign data to you, such as a customer number and login data. This data is also used for our customer administration and support (e.g. complaints management).	Contract performance
	The personal data we collect when concluding a contract with us is also used for the purpose of preventing and combating fraud. We also use these data to correctly identify existing customers when they contact us, as we need to be sure that we are in contact with the right person (e.g. to make a change to a subscription).	Legitimate interest
	In the context of combating terrorism, we are legally obliged to conduct identity checks and maintain certain identity records.	Legal obligation
Product and Service provision Invoicing Dispute management	We use your data for setting up, maintaining and supporting your products and services, such as establishing your connection and transmitting communication via our network and that of other operators, calculating your consumption for invoicing purposes and dealing with fault reports or complaints.	Contract performance
	We may send you communications for service reasons e.g. to notify you that your data limit has been reached, to ask you to reset your password, or to send you billing documents.	
	If you use third-party services and choose to pay via your Telenet bill (so-called "Direct Carrier Billing"), we will process certain data and pass it on to the third parties in order to enable invoicing and payment of these amounts to the third parties. For example: SMS parking, purchase of ticket from De Lijn, participation in an SMS voting or calling game, payment of subscription of streaming services (Netflix, Disney+, Amazon Prime...), purchase of digital services via Google (Play store), Apple (App store), Sony (PlayStation store)...	
	In order to establish an optimal Wi-Fi connection and to provide support in case of problems with your Wi-Fi network, we collect information from your modem about the devices that connect to your Wi-Fi network, about all	Legitimate interest

	connections to your Wi-Fi network and about neighboring Wi-Fi networks that may cause interference.	
Network management	<p>By analyzing network usage (e.g. the number of mobile phones connected to your Telenet homespot), we receive essential information about the use and load of our network. This enables us to perform good network management (routing traffic, solving malfunctions, monitoring peak and overload rates, etc.) and to improve our networks where necessary.</p> <p>In certain bundles, you can use apps (such as the Telenet TV app or WhatsApp) without your data usage being counted in your data pool (free G). To make this possible, we analyze your data usage.</p>	Contract performance
Quality improvement	<p>We may use your data to evaluate and improve our products and services. For example, we may check what type of hardware you have in order to optimize the use of our apps or check the quality of your Internet connection.</p> <p>We also seek to improve our products and services based on customer feedback about our services (e.g. through market research), data obtained during our discussions with or intervention at customers.</p> <p>With the Telenet 360° Wi-Fi, we gain insights about the use of your Wi-Fi pod(s) with the aim of improving our service. These insights include which devices are connected and how they are connected, the quality score, the presence of signal-disrupting networks in the neighborhood, overview of incidents, etc. These technical data are only used to allow the Wi-Fi system to make the right choices to ensure optimal operation and to proactively inform the customer about possible problems and corresponding solution.</p> <p>Certain telephone calls to our customer service are recorded for quality improvement and to support training purposes (this is indicated at the beginning of the call).</p>	Legitimate interest
	If we are unable to find the cause of a persistent disruption on a line, we may temporarily record calls for analysis - after first obtaining your consent.	Consent
Commercial use (marketing and direct marketing) for products of Telenet and affiliated companies	<p>Direct Marketing is the sending of advertising and carrying out of analyses with a commercial aim. We may use your data to offer you new products, services or special promotions that we think may be of interest to you. For example, you may receive an e-mail with a promo for a Telenet product you do not yet own. We can send this promotion via various channels (e.g. by post, e-mail, SMS or telephone).</p> <p>We will also send you newsletters and invitations to events such as competitions, family days, etc.</p>	Legitimate Interest

	<p>It is also possible that we may approach you when you are no longer a customer of Telenet. Or that we approach you as a potential future Telenet customer.</p> <p>From privacy level 2 onwards, it is possible that we let online platforms, such as Facebook and Google (YouTube), know to whom we want to show our advertisements or not. We share your name, e-mail address and/or phone number with them. In this way, they can match it with their data.</p>	
	<p>We may approach you with an offer as a future customer of Telenet, for example if you have given your consent to this when registering for a competition.</p>	Consent
Commercial use for other companies' products (personalized TV advertising)	<p>We can tailor standard TV advertising to your interests and preferences on a number of the TV channels with which we work. The combination of user data (e.g. your age, language, postal code, product mix and socio-demographic data such as family composition and street-level statistics) and your usage data (i.e. your TV viewing behavior) allows us to personalize your TV experience. For example, if you like to watch sports programs, you may be shown a commercial about sports shoes.</p>	Consent: Only customers in privacy level 3 are eligible.
Fraud management	<p>When you become a customer of Telenet, we'll ask you to read-in your ID card so that we can determine who you are and avoid identity theft. If you become an online customer, we will ask for your ID card number and national registry number for the same reason. We may also ask for proof of family composition in order to prevent abuse.</p> <p>Depending on the Telenet products and/or services you choose, we will also check your creditworthiness.</p>	Legitimate Interest
	<p>To protect our customers from fraud (e.g., via smishing), traffic on our network is automatically monitored to identify and stop fraudulent messages where appropriate. This means that you may not receive certain messages intended for you because they have been identified by our algorithms as smishing attacks. This monitoring may include automatic screening of message content. This screening of content is strictly limited to what is necessary to efficiently combat fraudulent activity.</p>	Legitimate interest
Security	<p>You will also be filmed by our security cameras in and around our offices and buildings. These images are stored solely for the purpose of security of goods and persons, and to prevent abuse, fraud and other offences to which our customers and ourselves may fall victim.</p>	Legitimate interest
	<p>As part of network and information security, your personal data may be processed. Providing a secure network and communication service is an essential part of our service.</p>	Contract performance
Support for government applications and legal obligations	<p>In many cases, we are required by law to retain certain personal data and/or communicate it to government agencies.</p> <p>We must, for example, pass on your location to the emergency services when you call 112.</p>	Legal obligation

	<p>We may also be required, within the framework of a police or judicial investigation, to pass on certain data in a confidential manner to the competent authorities.</p> <p>We also cooperate with the prevention of malicious calls at the request of the Office of the Ombudsman for Telecommunications.</p>	
Anonymized reporting	<p>We use your data to report internally and externally on the use of our services. These reports are anonymized and thus cannot be traced back to any particular individual.</p> <p>For internal reporting purposes, we generate anonymous reports for analysis and statistical insights. For example, reports are generated on the use of our services, on the TV viewing behavior of our customers, on the traffic on our infrastructure in the context of network management, on the use of our applications, on the performance of our customer service...</p> <p>Viewer statistics are compiled based on your viewing behavior. These reports contain anonymous figures relating to the number of viewers per broadcast and are shared with TV stations, which use these insights to evaluate broadcast programs.</p> <p>Besides the viewer statistics, we also pass on pseudonymized data to TV broadcasters about your viewing behavior collected via your TV box (only in relation to their own TV channels). The broadcasters analyze this information to gain insight into how viewers watch their programs (e.g. live viewing, recording and later viewing, postponed viewing, re-watching...) and on this basis they can optimize their programming. The personal data we transmit are pseudonymized by stripping all data that allows to identify an individual, with the exception of your customer number which is scrambled (by means of tokenization). You are not identifiable from the transmitted data.</p> <p>Lastly, we also use your location data (connection of your SIM card with the antenna mast) to make anonymous location reports ('how many people were at a certain place at a certain time?') for event organizations, supermarkets, cities/municipalities, etc. Once again, these reports are completely anonymous.</p>	Legitimate interest
Publication in telephone directories and intelligence services	<p>Your contact data are not published by default in telephone directories and enquiry services directories, this is only possible with your consent. For this publication, we are legally obliged to pass on your contact data via the Central Numbering Database, which then makes them available to providers of telephone directories and enquiry services.</p> <p>You can read more about this publication via this link.</p>	Consent

A word to the wise:

- The **content of your personal communication** is confidential. We process your data to make the communication technically possible, but the content of your personal communications that pass through our network (for example, fixed and mobile telephone calls, e-mails and SMS messages) are protected by the provisions of telecommunications secrecy. Telecommunications secrecy means that, apart from the exceptions enumerated by law, Telenet may not learn of the existence or content of such communications. Telenet has taken the necessary security measures and given adequate instructions to its employees to respect the secrecy of telecommunications.

One such exception is the automatic screening of text message content to combat smishing and other forms of SMS and MMS fraud. This screening is done using algorithms that help us detect and block fraudulent messages. This means that end users may not receive certain messages that were intended for them because they have been identified as smishing attacks. The screening of the content of communications is limited to what is absolutely necessary to efficiently combat fraudulent activities via SMS or MMS communications as permitted by Belgian Electronic Communications Law (art. 125, §1, 7°). This means that not all communications will be analyzed for content.

- **Automatic decision-making:** Telenet does not make any automatic decisions - whether or not based on profiling - that have legal consequences for you or which significantly affect you, unless:
 - *this is necessary for entering into or executing your agreement (e.g. creditworthiness check, or shutting down your Telenet products and services in case of non-payment);*
 - *this is permitted by law (e.g. for the detection of tax fraud); or*
 - *if we have obtained your explicit consent.*

Telenet uses automatic decision making to identify new customers in the shops to prevent identity fraud. The identity document is read or the number of the identity document is entered after which an automatic verification is done in the CheckDoc application of the FPS Home Affairs. If this verification reveals that the identity document is expired, stolen, forged or invalid for any other reason, we cannot accept the document and the requested service will be refused. You can file an objection to this with the FPS Home Affairs through [this link](#).

d. Summary table

The table below gives an overview of the different categories of personal data, which specific personal data they include, for which purposes they are processed, how we obtained them, what the legal basis is, how long we keep the data and with whom we share it.

We have tried to make the table below as complete as possible, taking into account all possible processing by Telenet. These do not always apply to everyone, however. If you only have a mobile subscription, we obviously have no data about your viewing behavior and no technical number of a TV box. If you only have an Internet subscription, we will have no data about the connection of your SIM card with the antenna towers.

From whom?	Data type?	Data category?	What Personal Data?	How was it obtained?	Goals?	Legal basis?	How long?	Who do we share it with?
Customers, former customers	User data	Identification and contact details	E.g. name, address, date of birth, ID-card number, copy ID card, nationality, gender, National Registration Number, place of birth, telephone number, e-mail address	When registering as a customer in the shop, via the online ordering platform, via the customer service department (call center), when applying for the social rate, when concluding a credit contract or by entering the details in My Telenet	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Anonymized reporting 	Legitimate interest Legal obligation Contract performance	As long as you are a customer. Up to 3 years after you cease to be a customer	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman..., De Centrale Nummerdatabase Social media platforms (from privacy level 2: they may not use this data for their own purposes), Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
		Sensitive data: biometric data	Facial image (selfie) and photo of identity document to enable image recognition	Upload photo and scan of identity document in the Telenet online shop	<ul style="list-style-type: none"> - Identification of new customers 	Explicit consent	No storage	This data is shared real-time with a vendor specialized in image recognition software (e.g., Onfido) and is immediately deleted afterwards.
		Contract data	E.g. products, customer number, user name, invoice, order confirmation, contract, TV box model/number	When creating and managing as a customer, by allocation	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Legal obligation Contract performance Consent	As long as you are a customer. Up to 10 years after you are no longer a customer for certain data, such as the contract	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...) Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
		Living and consumption habits	E.g. animal lover, travel habits	Purchase from third parties	<ul style="list-style-type: none"> - Marketing of own products - Marketing of third-party products 	Legitimate interest Consent	13 months for existing and former customers	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)

	Family details	E.g. civil status, family members	Purchase from third parties, create profiles on My Telenet with a family bundle	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Marketing of own products - Marketing of third-party products - Anonymized reporting 	<p>Legitimate interest</p> <p>Contract performance</p> <p>Consent</p>	As long as you are a customer. Up to 3 years after the ending of your contract	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
	Financial data	E.g. payment data (bank account number), asset data (e.g. homeowner)	When creating and managing as a customer	<ul style="list-style-type: none"> - Product and service provision, invoicing - Sales, after-sales service and customer support - Fraud management - Marketing of own products - Marketing of third-party products - Support for government applications and legal obligations 	<p>Legitimate interest</p> <p>Legal obligation</p> <p>Contract performance</p> <p>Consent</p>	As long as you are a customer. Up to 3 years after the ending of your contract	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>The government (police, ombudsman...)</p> <p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
	Communication data	E.g. created contacts, answers to surveys, your preferences such as your privacy settings, recorded conversations with Customer Service, remote control commands	Customer service call, visit to a shop, contact via the contact form, completed surveys, use of voice control	<ul style="list-style-type: none"> - Product and service provision, invoicing - Sales, after-sales service and customer support - Quality improvement - Fraud management - Marketing of own products - Marketing of third-party products - Anonymized reporting 	<p>Legitimate interest</p> <p>Contract performance</p> <p>Consent</p>	Recording calls with Customer Service: 30 days. Voice control: 0 (no retention). Other data: existing customer as long as you are a customer (privacy setting) or up to 24 months (survey answers), ex-customer: 36 or 24 months depending on data.	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
Transactional data	Technical data	E.g. MAC address, IP address, SSID, IMSI	By allocation, when using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management 	<p>Legitimate interest</p> <p>Legal obligation</p> <p>Contract performance</p> <p>Consent</p>	13 months for traffic data, 36 months for TV consumption data	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>The government (police, ombudsman...)</p>

				<ul style="list-style-type: none"> - Support for government applications and legal obligations - Marketing of own products - Anonymized reporting 			<p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
	Location data	E.g. connection to mast, GPS coordinates, Wi-Fi connection	When using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Anonymized reporting 	<p>Legitimate interest</p> <p>Legal obligation</p> <p>Contract performance</p> <p>Consent</p>	13 months	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>The government (police, ombudsman...)</p> <p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
	Consumption data	E.g. time of call, duration of call, URLs, TV programs watched (viewing behavior)	When using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Marketing of third-party products - Anonymized reporting 	<p>Legitimate interest</p> <p>Legal obligation</p> <p>Contract performance</p> <p>Consent</p>	13 months for traffic data, 36 months for TV consumption data	<p>Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.</p> <p>The government (police, ombudsman...)</p> <p>Companies in the Liberty Global and Telenet group.</p> <p>With your consent: specific partners (see chapter 5)</p>
	Communication content	E.g. E-mail inbox, SMS/MMS, phone calls, voicemail recordings	When using Telenet services	<ul style="list-style-type: none"> - Safety - Fraud management - Quality improvement 	<p>Legitimate interest</p> <p>Contract performance</p> <p>Consent</p>	No storage except for E-mail inbox (customer management) as long as customer is customer, up to 18 months for former customers *Call recording for quality reasons (depending on the case)	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.
	Behavioral data	E.g. navigation through TV box menu, data obtained via cookies	When using Telenet services, when visiting the websites, when using Telenet apps	<ul style="list-style-type: none"> - Product and service provision, invoicing - Quality improvement - Marketing of own products 	<p>Legitimate interest</p> <p>Contract performance</p>	36 months for existing customers, 3 months for former	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.

					<ul style="list-style-type: none"> - Marketing of third-party products - Anonymized reporting 	Consent	customers. Separate periods for data obtained from cookies (see cookie policy, chapter 4)	Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
	Derived data	Profiles	E.g. sports fan, Wi-Fi-score	Derivation from user and transactional data	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Contract performance Consent	120 months for existing customers, 24 months for former customers	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
	Sensitive data	Medical data	E.g. social rate attestation, guardianship	In customer creation and management	<ul style="list-style-type: none"> - Sales, after-sales service and customer support - Fraud management 	Legitimate interest Contract performance	No storage attestation. Guardianship data follow the retention period of identification data	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group
Users (all individuals who make use of the Telenet services without being a contract holder/customer, whether or not registered with their own profile on My Telenet)	User data	Identification and contact details	Name, date of birth, e-mail address, telephone number	When creating a profile on My Telenet	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Legal obligation Contract performance Consent	Follows the same retention period as the customer to which the profile is linked	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...) Social media platforms (from privacy level 2, they may not use this data for their own purposes), Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
		Communication data	Privacy settings, recording of customer service calls, voice commands	When creating a profile on My Telenet, through allocation, customer service call, use of voice control	<ul style="list-style-type: none"> - Product and service provision, invoicing - Sales, after-sales service and customer support - Quality improvement - Fraud management - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Contract performance Consent	Recording of customer service calls: 30 days. Voice control: 0 (no retention). Other data: existing customer as long as you are a customer (privacy setting) or up to 24	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group With your consent: specific partners (see chapter 5)

						months (survey answers), ex-customer: 36 or 24 months depending on data.	
Transactional data	Technical data	E.g. MAC address, IP address, SSID, IMSI	When using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Anonymized reporting 	Legitimate interest Legal obligation Contract performance Consent	13 months for traffic data, 36 months for TV consumption data	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...) Companies in the Liberty Global and Telenet group.
	Location data	E.g. connection to mast, GPS coordinates, Wi-Fi connection	When using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Anonymized reporting 	Legitimate interest Legal obligation Contract performance Consent	13 months	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...) Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
	Consumption data	E.g. time of call, duration of call, URLs, TV programs watched (viewing behavior)	When using Telenet services	<ul style="list-style-type: none"> - Product and service provision, invoicing - Network management - Sales, after-sales service and customer support - Quality improvement - Fraud management - Support for government applications and legal obligations - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Legal obligation Contract performance Consent	13 months for traffic data, 36 months for TV consumption data	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...) Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
	Communication content	E.g. E-mail inbox, SMS/MMS, phone calls, voicemail recordings	When using Telenet services	<ul style="list-style-type: none"> - Safety - Fraud management - Quality improvement 	Legitimate interest Contract performance Consent	No storage except for *E-mail inbox (customer management) as long as the customer is a	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc.

							customer, up to 18 months for former customers; * Telephone call recording for quality reasons (depending on the case)	
Prospects	User data	Identification and contact details	Name, address, telephone number, e-mail address, ID check data (such as ID card number) in the customer creation process (e.g. online order cancelled)	Third-party purchases, registration of events, competitions, attempted customer creation	<ul style="list-style-type: none"> - Sales, after-sales service and customer support - Quality improvement - Fraud management - Marketing of own products - Anonymized reporting 	Legitimate interest Consent	Until withdrawal of consent (with continuous refresh)	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group
		Communication data	"Opt-out setting, recording call customer service	Customer service call, shop visit, contact via contact form	<ul style="list-style-type: none"> - Sales, after-sales service and customer support - Quality improvement - Marketing of own products 	Legitimate interest Consent	Until revocation of consent, 1 month for customer service recordings	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)
Visitors	User data	Identification details	Surname, first name, name of company represented, ID card, license plate, camera images	Visit Telenet offices, Telenet shops	<ul style="list-style-type: none"> - Safety 	Legitimate interest	13 months	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. The government (police, ombudsman...)
	Transactional data	Behavioral data	Data obtained via cookies	Visit Telenet websites	<ul style="list-style-type: none"> - Quality improvement - Marketing of own products - Marketing of third-party products - Anonymized reporting 	Legitimate interest Consent	See cookie policy	Specialized suppliers such as our call centers, IT support companies, data analytics companies, etc. Companies in the Liberty Global and Telenet group. With your consent: specific partners (see chapter 5)

4. How do we protect your personal data?

The protection of your personal data is a priority for Telenet. To this end, we have implemented appropriate technical and organizational security measures to protect the personal data contained in our systems and databases as much as possible against unauthorized access and/or use, loss or theft. These measures are regularly tested, evaluated and, where necessary, adapted in order to guarantee an adequate security level at all times.

Our information security policy is fully based on the international ISO 27002 standard, and contains guidelines with regard to access control, data encryption, security of operations, security of communications, physical security, etc. A specialized security team is responsible for the implementation and follow-up of the guidelines, so that the security of our databases, networks, infrastructure and information systems is guaranteed.

The development or implementation of new systems, applications or new products is designed with the highest security in mind, and always taking your privacy into account (the 'privacy by design' principle). Our security and privacy experts work closely together with the development teams to ensure that the appropriate protection is in place, commensurate with the assessed risk associated with the processing of the personal data in question.

Access control is an important aspect of our information security policy. Telenet has implemented procedures to limit access to our databases, systems, equipment and networks to those persons who strictly need this access to perform their job. These persons must observe a strict obligation of confidentiality and comply with all guidelines for ensuring the protection of personal data.

Telenet also provides privacy and security-specific training for its employees, in order to clarify the guidelines and procedures to its employees and to make them aware of the risks involved in processing personal data.

Telenet also imposes high security requirements on its partners and suppliers who process your personal data on our behalf. Partly by means of contractual guarantees, we ensure that, just like us, they process your data safely and with respect for the privacy legislation. We therefore expect our partners and suppliers to implement an information security policy and security measures that are grafted onto international standards and best practices.

5. Do we pass on your personal data? And to whom?

In order to be able to offer you our services, we sometimes call in third parties under certain circumstances, who have access to your personal data. A transfer to third parties only takes place within the framework of the purposes as described in [title 2.c.](#) We have listed the parties to whom we transfer data below.

❖ **Transfer of personal data to third parties working on our behalf**

We make some of our databases accessible to third parties who are working on our behalf, and who assist us in providing our products and services. Here are a few examples:

- *Commercial agents who sell our products;*
- *Companies and self-employed technicians who maintain our network and provide the installations;*
- *External call centers that assist our customers by telephone on a daily basis;*
- *Logistic companies that deliver our appliances to you;*
- *The management of our external legal archive (for e.g. invoices), both digital and paper;*
- *Companies that take care of our outgoing paper document flow (e.g. invoices);*
- *Credit management specialists who analyze the solvency of prospective customers;*
- *Collection agencies and legal service providers in the context of collecting our invoices;*
- *Cloud providers;*
- *Security firms (cybersecurity);*
- *Companies specialized in ICT to support our IT team;*
- *Companies specialized in telecommunications and network infrastructure;*
- *Companies affiliated with Telenet (belonging to the Liberty Global or Telenet group, who manage technical platforms or software applications for us);*
- *Other telecom operators in order to enable network interconnection (connection to electronic communication networks of other operators), as well as its administration (billing and settlement between operators);*
- *Specialized big data companies (data brokers and data analysts) in the context of data enrichment and data analysis;*
- *Market research companies;*
- *Marketing agencies that assist us in all kinds of advertising campaigns;*
- *Partners with whom we cooperate in the framework of a specific action (e.g. a travel agency for a Telenet competition in which you can win a city trip).*
- *Specialized cookie analytics companies (such as Google and Adobe);*
- *Specialized companies that support us in our fight against spam and other abuse through our websites (such as, for example, reCAPTCHA Enterprise, part of Google);*
- *Universities, in the context of product development and innovation;*
- *Social media channels such as Meta, Google, LinkedIn, etc., e.g. in the context of direct marketing campaigns via these channels (they may not use this data any further to enrich their own data).*

The transfer of your data is limited to the data that they need to perform their task on our behalf. We ensure that they, as well as we, manage your data

securely, respectfully and with due care, and we provide appropriate contractual safeguards for this.

❖ **Transfer of personal data in the context of a legal obligation**

The law requires us to transfer certain personal data to a number of authorized bodies. Here are a few examples:

- *Emergency centers;*
- *Judicial authorities;*
- *Belgian intelligence services;*
- *Fiscal authorities;*
- *Central Number Database;*
- *Belgian Institute for Postal Services and Telecommunications (BIPT);*
- *Telecommunications Ombudsman Service.*

❖ **Passing on personal data to other companies within the Telenet Group**

We may pass on your personal data to affiliated companies within the Telenet Group. A few examples:

- *To keep you informed of the products and services of the entire Telenet group;*
- *In case of non-payment, we can also pass on your payment habits to protect the justified interests of the Telenet group.*

The companies within the Telenet group qualify as separate data processors in this context, and the agreements regarding data processing are laid down by contract between the respective companies.

❖ **Transfer of personal data to third parties in the context of an acquisition or merger**

We may transfer your personal data to third parties in the context of an acquisition or merger transaction. This also applies to the preparatory phase of the transaction. Again, data processing arrangements will be contractually defined in a data processing agreement between the respective companies.

❖ **Transfer of personal data to third parties who do not work on our behalf**

We can only pass on your data to other companies (with their own privacy policies), who determine their own purposes for processing your data, if you have given your consent.

We may also, in certain cases, transfer your personal data to other parties who determine their own purposes for processing your data. These third parties therefore act as data controllers (or joint-controllers) and their own privacy policies (also) apply.

This transfer is only possible if you have given your consent, if the transfer is necessary to fulfill the obligations of our agreement or to meet the legitimate interests of Telenet or a third party.

The transfer is limited to only those personal data which are necessary and relevant for the intended processing.

Some examples of data transfer with **your consent**:

- *Transfer of your contact information (name, address, phone number) to directory providers and intelligence services providers through the [Central Number Database](#).*
- *Transfer of your device identification number ('IMEI'), SIM card ('IMSI' or 'ICCID'), mobile network operator code (which identifies your mobile network operator 'MNC') and mobile country code (which identifies the country you are in, 'MCC') to [Belgian Mobile Wallet SA/NA](#) for their mobile identity solution: the 'Itsme' app.*
- *Transfer of your personal data (e.g., name, email address, age, gender, zip code, cookie data, customer profile...) to [Ads&Data](#), which will compile an advertising profile (e.g., sports enthusiast, male, age group...) based on this data and other collected data in order to automatically select personalized ads that will be shown to you on certain websites and applications. Ads&Data will not transmit your data to advertisers or other partners but uses a secure intermediate platform in which data is encrypted and thus not readable by another party. Ads&Data and Telenet act as joint data controllers.*
- *Transfer of the identification number of your TV box and your customer profile to advertisers ([DPG Media](#)) to offer you personalized TV advertising related to products and services of other companies. The data is shared via a secure intermediate platform.*
- *Passing on your mobile number and confirmation that you are a Telenet customer to **NAKI Mobile Power Solutions** in order to qualify for a Telenet customer discount.*
- *We are only a reseller for certain hardware, e.g. telephone or TV sets, the [Nuki](#) smart lock, the [Ring](#) smart doorbell, etc. In order to enable the activation of these devices, we pass on your contact details to the manufacturer of these devices.*
- *It is also possible that Telenet allows third parties to place cookies on our websites for their own marketing purposes or that Telenet passes on the collected cookie data to third parties. This is only possible if you have given your explicit consent. You can read more about this in the [Telenet Cookie Policy](#).*

Consent is given through the choices you have made in your privacy settings, through your TV box or specifically for the intended data processing after we have informed you about it.

Some examples of data transfer in the context of **contract performance**:

- *To enable network interconnection (connection to other operators' electronic communications networks) and roaming, as well as all relevant administration (billing and settlement between operators), we will transfer your personal data to other telecom operators.*

- *We offer customers the possibility of paying for third-party services via their Telenet bill (so-called "Direct Carrier Billing"). If you wish to make use of this, we will receive and pass on certain data to these third parties to enable the billing and payment of these amounts to the third parties. Some examples of what these services may include:*
 - *SMS parking;*
 - *Purchasing a ticket from a transportation company (De Lijn);*
 - *Participating in an SMS voting or calling game;*
 - *Purchase of digital services through Google (Play store), Apple (App store), Sony (PlayStation store)...*
- *We offer customers the option to pay the subscription costs of streaming services such as Netflix, Disney+,... through their Telenet bill. If you choose to enter into the subscription through Telenet, we will pass on your details (email address, cell phone number,...) to the relevant streaming service so they can contact you directly to create a profile so you can use their services.*
- *Passing on your account number and TV products (Streamz, Streamz+) to Streamz so that you can also view content on their app.*

Example of data transfer in the context of **legitimate interest**:

- *We transfer our data (email address, age, family data, profiles, last viewed films or series) to our partner Streamz to create our newsletters. These newsletters keep you informed of new releases on the Streamz platform and recommend films and series that might interest you.*

❖ **International data transfers**

Your personal data is also processed outside the European Union (the European Economic Area, also called EEA). It's a fact that many large IT suppliers, infrastructure providers and technology companies are not based in the European Union.

Some examples:

- *External call center - Morocco;*
- *Maintenance of IT systems 24/7 - India, China, US;*
- *Network infrastructure - China;*
- *IT Security - India, US;*
- *Cloud providers - US;*
- *Interconnect and Roaming - worldwide;*
- *Software applications - US.*

When transferring your personal data outside the EEA, we always respect the requirements of the privacy legislation regarding international transfers:

- We may transfer personal data to countries that the European Commission has determined to provide an adequate level of data protection in accordance with European privacy legislation (GDPR), and

- We may transfer personal data based on the relevant modules of the European Commission's standard contractual clauses.

Moreover, we have aligned ourselves with the guidelines regarding international data transfers issued by the European Data Protection Board. For each international transfer, we conduct a Data Transfer Impact Assessment to assess the legislation of the third countries and identify any practices that are incompatible with the obligations of the transfer mechanism. This analysis also allows us to identify additional security, contractual and organizational measures to protect the data from unauthorized access by the third country government authorities.

6. How long do we keep your personal data?

We are not allowed to keep personal data longer than is necessary to realize the purpose for which we collect it. The retention period may therefore differ for each purpose. Please refer to the table under [title 2.d.](#) for an overview of the retention periods. The maximum retention period is always given in this table.

Some examples:

- *Traffic data relating to communications and connections are never kept for longer than 13 months;*
- *TV viewing behavior is stored for a maximum of 36 months;*
- *Recorded conversations with the Telenet Customer Service are stored for a maximum of 30 days;*
- *Invoice data will be kept for a maximum of 7 years;*
- *Your contract and order confirmations are kept for a maximum of 10 years after you have left Telenet as a customer.*

After expiry of the applicable retention period(s), personal data is automatically deleted or anonymized.

If you leave Telenet as a customer, we can contact you again up to 3 years after you left in order to inform you about a new offer.

7. Use of your personal data for commercial purposes

We use your data mainly to provide you with a good service. For example, to be able to execute the contract, to make your service work, to manage our network, to be able to support you as a customer properly, to inform you about your consumption, to send your invoice, etc.

We also use your data for commercial purposes. For example, to deliver advertising to you, to raise awareness of our brand, or for analysis aimed at getting to know our customers better. For this purpose, we want to give you control over your data: you

decide which data we can use. We have therefore developed a system of 4 privacy levels that allow for different degrees of data use. Of course, you also retain the right to oppose all use of your personal data for commercial purposes (the so-called 'full opt out'). You can manage your choices via your privacy settings in MyTelenet. You can read more about how to do this in section b of this chapter.

Keep in mind:

- By customer, we mean the person who signed the contract. This is limited to private customers, the self-employed and small businesses (such as sole proprietors), though.
- Privacy choices for most products are registered at the contract level. This means that everyone who uses this product (e.g. TV products) is subject to the same choices within the same contract.
- With certain products (e.g. bundles for families or for employers who assign SIM cards to their employees), it is necessary to create a profile per user (via My Telenet), where each user receives and can manage his own privacy level. This is the case, for example, with bundles that have several SIM cards linked to them and that are used by individual users. These individual users must register themselves and are assigned their own My Telenet account and can manage their own privacy level.
- If you are an former customer, your privacy choices continue to apply. You can always have this modified as provided for active customers.
- For minor users (-16 years old) Telenet has a very strict policy: personal data of minors are automatically assigned the most restrictive privacy level, without any form of personalization based on personal data. Otherwise, to the extent required by law, Telenet will request the prior consent of the parent(s) or guardian(s) of the minor.
- In addition to the privacy level, there are also communication channels. You can specify the channels through which Telenet can contact you for commercial communication. You can choose mail, email, SMS or telephone. Note: this is only possible at contract level.

a. What levels of privacy are there?

As explained earlier, you can decide yourself which data we may use for commercial purposes, according to your privacy level. You can choose from different levels, ranging from 'no use of your personal data for commercial purposes' to a fully personalized Telenet experience.

❖ No use of your data at all ('full opt-out')

Let's start with 'no use of your data at all for commercial purposes'. You will thereby not receive any advertising from Telenet. Here, we combine privacy level 1 with turning off all your communication channels. We also call this the 'full opt-out'.

Privacy level 1 means that no commercial profiles of you are created, and that you are no longer included in commercial analyses. In addition, all communication channels will be switched off with a 'full opt-out', so that you will no longer receive commercial mail, e-mail, telephone or SMS from us.

The commercials on TV are also not personalized for you. You watch the standard commercials on TV. The advertising campaigns you may see on social media platforms such as Facebook, Google, etc. (if you have an account there) are also not personalized.

You will continue to receive communications for service reasons, such as the announcement of works, changes to security settings, reaching your data limits or sending your bill. You cannot stop these as long as you are a customer.

We still process your viewing behavior in order to recommend the right program, series or film to you on your TV box . It is possible that we could recommend a program, series or film for which you would have to pay. We don't use your viewing behavior for these paying recommendations (which are not included in your current TV subscription). You only see those that all customers with a TV box see. If you don't want recommendations, you can turn them off in the settings of your TV box .

❖ Privacy level 1: General

At this level you will still receive advertising, but it will not be personalized, and your data will not be used for commercial analysis.

We only use a very limited set of your user data, such as your name, address, e-mail address, choice of language, gender (for the correct title) and product portfolio. We do not use any of your transactional data (such as the programs you watch) for commercial reasons (although we do use it for service reasons, otherwise you wouldn't be able to call, surf or watch TV). No commercial profiles are created.

Your data will not be used in commercial analyses. Nor are the commercials on TV personalized for you. You see the standard commercials on TV.

If your communication channels are turned on, you can receive the general advertising that we send to all our customers, or to all the customers who have the same product.

Communications for service reasons such as job notifications, changes to security settings, notifications that you are exceeding your data limit or your bill will still be sent to you. You cannot stop this as long as you are a customer.

We process your viewing behavior in order to recommend the right program, series or film to you on your TV box . It's possible that we could recommend a program, series or film for which you would have to pay. We don't use your viewing behavior for these paying recommendations (which are not included in your current TV subscription). You only see those that all customers with a TV box see. If you don't want recommendations, you can turn them off in the settings of your TV box .

We don't use any location data (the connection of your SIM card to the GSM antennas) at this level, which is to be included in the anonymous reports that we make available to cities, towns, shopping centers, etc.

We do not share any data with the social media platforms Google (e.g. YouTube), Facebook, etc. at this level. This means that the advertising campaigns you may see on these platforms are not personalized.

❖ Privacy level 2: Focused

Level 2 stands for personalized advertising for Telenet products. We use your user and transactional data to build commercial profiles (derived data) and include them in commercial analyses. If your communication channels are turned on, you will receive this personalized advertising.

To understand what user data and transactional data is, please refer to [section 2.a](#) in this Privacy Policy. It's important to note that we don't use all of this data. For example, we will not use your copy of an ID card, your photograph (if we have one), sound and image recordings, your national registration number, your location data, the URLs you visit (which we also call surfing behavior), your activity on forums, the content of your communication, etc., in commercial analyses or to build up profiles of you.

Each new customer (as well as each new profile of individual users) is assigned level 2 by default, but this can be changed at any time.

The commercials on TV are not personalized for you. You will see the standard commercials on TV.

We process your viewing behavior in order to recommend the right program, series or film to you on your TV box. It's possible that we may recommend a program, series or film for which you would have to pay, and we may use your viewing behavior for these paid recommendations (which are not included in your current TV subscription). If you don't want recommendations, you can turn them off in the settings of your TV box.

From level 2 onwards, your location data (the connection of your SIM card to the GSM antennas) is used in order to include it in the anonymous reports that we make available to cities, municipalities, shopping centers, etc. Please note that these reports are completely anonymous. For example, it is reported how many people visited the Grand Place of Brussels during the holidays. Or how many people drive into Mechelen via the motorway.

We may show you advertisements for our products on the channels of social media platforms (Meta, Google (e.g. YouTube), etc.) if you have an account. From level 2 onwards, we may let them know who we want to show the advertising or not. We share your name, e-mail address and/or telephone number. This is how they know if you have an account, but they cannot read your data. The data is first converted into numbers and letters (hashing) according to a key. Meta, Google, etc. also have your name and e-mail address, and have converted these into the same numbers and letters. In this way, they can match (compare) your name and e-mail address with the

data they also have and know to whom they may show the commercial. After matching, they delete the uploaded data. They are not allowed to use it for any other purpose (e.g. to enrich their own files), which wouldn't be possible, as it is not readable by them. After matching, they know who is eligible for the advert. They must also delete this data after the campaign (the period during which the advertisement is offered).

❖ Privacy level 3: Personal

Level 3 is all about your TV experience. Everything from Level 2 applies here too. In addition, your data will also be used to tailor the TV spots you see to your preferences and interests. For example, if you or a family member often watch athletics, you will be more likely to see a commercial about sports equipment. If you don't have any babies at home, you won't have to watch adverts about nappies.

We don't share any data with advertisers when we offer you personalized TV spots. The advertiser selects the type of profiles to which they want to show a particular TV spot (e.g. a sports shoe manufacturer wants to show a TV spot to sports fans), and we then ensure that the TV spot is shown to the right target group. In certain cases, we make use of a secure intermediary platform that allows us to compare the advertiser's data with our customer base, and thereby determine which of our customers are eligible for the advertiser's TV spot. By using this secure platform, Telenet does not have to share any customer data with the advertiser, and, in turn, the advertiser does not share any data with Telenet. After the datasets have been compared on the secured platform (to which neither party has access), they are deleted.

If you became a Telenet customer before May 25, 2018, (the date of entry into force of GDPR), you were classified as Level 3 by default. You can always change your privacy level.

❖ Privacy level 4: Unique

In level 4, you choose a fully personalized experience. Everything from level 3 applies here. In addition, we supplement this with data about your surfing behavior, in order to supplement your profiles or for commercial analyses.

By 'surfing behavior', we mean the websites (the URLs) that you have visited. We can derive interests from this. We obtain this data from the application that is used to manage the network.

Some examples:

- If you have visited a webpage of a travel organization, we can provide you with interesting, customized offers or additional information on how and where you can surf free-of-charge when abroad;
- If you regularly surf on sports websites, we can show you targeted TV advertising for sports products.

We find it important to mention that the content of your communication is not processed. We will therefore never see which film clips you have opened on a particular website. Visits to websites that deal with sensitive content (such as websites that provide medical advice or those with erotic content) will also not be processed.

Summary table

For your information: the table below is applicable to all privacy levels, i.e. both the privacy level at the contract level (all users under the same contract are subject to the same privacy level) and at the individual privacy level (users with their own profile in My Telenet).

Gradation?	Any advertisements?	On the basis of which data?	Are TV commercials relevant to you?	Any communication for service?
I don't want advertising and I do not want to be profiled: 'Full opt-out' (privacy level 1 + all communication channels turned off)	No	No	No	Yes
I don't want to be profiled: privacy level 1	Yes, but not personalized No, if you have your communication channels turned off.	Name, address, e-mail address, choice of language, gender (for correct title) and product portfolio	No	Yes
I want to receive advertising tailored to my preferences (my profiles): privacy level 2 = our default level	Yes No, if you have your communication channels turned off.	User and transactional data. Derived data.	No	Yes
I want to receive advertising that is tailored to my preferences (my profiles) + I want TV commercials to be more tailored to me: privacy level 3	Yes No, if you have your communication channels turned off.	User and transactional data. Derived data.	Yes	Yes
I want to receive advertising that is tailored to my preferences (my profiles) + I want the commercials on TV to be more tailored to me. You may use my surfing behavior for both: privacy level 4	Yes No, if you have your communication channels turned off.	User and transactional data. Derived data. Surfing behavior.	Yes	Yes

b. How can you manage your privacy level?

You can consult and adjust your privacy level:

- Via [My Telenet](#) (only for customers/users with an active My Telenet account/profile and former customers for whom the My Telenet environment is still active);
- Via a [Telenet point of sale](#) (after an ID check);
- Via our [Customer Service](#) (after an ID check).

The change of privacy level can take a while (max. 72h).

For each privacy level, you have the choice of turning your communication channels on or off. Changing the privacy level has no effect on your communication channels.

If you don't wish to receive any further advertising and you don't want your data to be used for any commercial purposes (the so-called 'full opt-out'), you can 'request the complete removal of all communications' (this is the right to object). With this request, your privacy level will be set to level 1 (if it is not already), and all communication channels will be turned off for you. This request can be made in the same way as indicated above.

We would like to add this:

If you are a former customer, your privacy level will continue to apply. You can also have this changed at any time as described above.

If you have never been a customer, you have participated in a competition or we have obtained your data from a third party and you do not want Telenet to send you advertisements or to use your data for our commercial purposes, then you can:

- Use the unsubscribe link that you can find at the bottom of the marketing e-mail from Telenet;
- Contact us using [this form](#);
- Drop by a Telenet shop and ask the staff member to launch a request for 'Full unsubscription for all commercial communications'.

8. What are your privacy rights and how can you exercise them?

To give you more control over your personal data, you can easily manage it by requesting the exercise of your privacy rights.

a. Overview of your privacy rights

❖ Your right of access

You have the right to request access to your personal data. We will then provide you with an overview of the personal data we process about you. We will initially

provide you with an automatically generated standard report. If this does not meet your expectations, or if you need specific information, you can make an additional request via the link included with the standard response.

❖ **Your right to update personal data**

You have the right to have incomplete, incorrect, inappropriate, or outdated personal data corrected.

In order to keep your data up-to-date, we would ask you to notify us of any change, such as a move, a change of e-mail address or a renewal of your identity card. We already provide a periodic pop-up in My Telenet, where you are asked to update your contact details.

❖ **Your right to the erasure of your data (the 'right to forget')**

You have the right to have your personal data deleted if:

- *your personal data is no longer needed for the purposes for which it was collected or otherwise processed by Telenet;*
- *you withdraw your previous consent for the processing and there is no other legal ground on which Telenet can rely for the (further) processing;*
- *you object to the processing of your personal data, and there are no more weighty, legitimate grounds for the (further) processing by Telenet;*
- *your personal data is being processed unlawfully;*
- *your personal data must be deleted in order to comply with a legal obligation;*
- *your personal data was collected when you were a minor.*

Do bear in mind that we cannot always remove all the requested personal data, for example when the processing of this is necessary for the provision of your service, for the exercise of a legal claim, or because the data is necessary in order to comply with a legal obligation or to fulfil a task of general interest.

❖ **Your right to restrict the processing of data**

In specific cases, you have the right to obtain the limitation of the processing of your personal data. This is the case, for example, when you dispute the correctness of personal data or when your data is no longer necessary in order to achieve the purposes of the processing, but you need it for the establishment, exercise or substantiation of a legal claim.

❖ **Your right to portability of personal data/the transfer of data**

You have the right to 'recover' your personal data, for example, in order to be able to change your service provider more easily. This is only possible for the personal data you have provided to Telenet yourself, based on consent or agreement. In all other cases, you are not entitled to this right (for example when your data is processed on the basis of a legal obligation).

❖ **Your right to object to the processing of your personal data**

You have the right to object when Telenet uses your personal data for purposes other than those necessary for executing an agreement or that are necessary for complying with a legal obligation. You must then submit a substantiated request (containing the specific reasons why you wish to object to the

processing) and Telenet will, in the event of a justified request, stop the use of your personal data unless we have compelling reasons for not doing so.

A substantiated request is not required when it comes to processing in the context of Direct Marketing activities (including profiling). You always have the right to oppose the use of your personal data for Direct Marketing purposes without having to provide a reason.

There are two possibilities:

- **You no longer wish to receive any form of commercial communication?** You can exercise your 'right of object' via My Telenet (request: 'Complete deregistration for all commercial communication') and we will then make sure you will no longer receive any commercial communication from us. Bear in mind that we will still contact you within the framework of the execution of your contract, or if the law obliges us to do so. If you do not have a My Telenet account, you can go to a Telenet shop to do this or contact us using [this form](#).
- **You want to choose the channel through which you receive commercial communications?** You can choose to receive commercial communications only by e-mail, SMS, post or telephone. To deactivate a channel, simply make your preference known to our customer service or visit one of our points of sale.

Furthermore, anyone (including former customers and prospects) can make use of these unsubscribe options:

- **If you do not wish to receive commercial calls**, you can subscribe to the so-called "do-not-call-me" list (www.dncm.be).
- **If you no longer wish to receive commercial letters**, you can subscribe to the so-called Robinson list (www.robinsonlist.be).
- **If you do not want to receive any more commercial SMSs**, you can reply with "STOP" to the number that sent you the SMS.
- **If you no longer wish to receive commercial e-mails**, you can use the unsubscribe option in the relevant e-mail.

Please note that the fact that you no longer wish to receive commercial communications from us does not affect our right to contact you within the framework of the performance of your contract, or if we are obliged to do so by law.

b. How can I exercise my privacy rights?

You can exercise your privacy rights in two ways:

- **Are you a Telenet customer?** Register via My Telenet and fill in the application via this [link](#). This is only possible for customers who have an active My Telenet account;
- **You are no longer, or have never been a customer?** Then you can go to a [Telenet point of sale](#) to launch your application.

To ensure that the request is made by the right person, we will need to verify your identity. If you launch your request via My Telenet, your successful login and password will serve as your identification. If you make your request in a Telenet point of sale, we will ask you to identify yourself by means of your identity card. If we cannot identify you with certainty, we will not respond to your request.

Please note: due to the complexity, a different application procedure applies to the exercise of the privacy rights listed below. This concerns:

- *Right to restrict the processing of data*
- *Right to object to the processing of your personal data if it is **not** for the purpose of Direct Marketing*

If you wish to exercise these rights, please submit your request to the Data Protection Officer (or "DPO") using [this form](#). We will also ask you to identify yourself.

Is there a charge? You may exercise your privacy rights free-of-charge, unless your request is manifestly unfounded or excessive, in particular due to its repetitive nature. In such a case, we have the right and the choice - in accordance with the privacy legislation - (i) to charge you a reasonable fee (which takes into account the administrative costs of providing the requested information or communication and the costs involved in taking the requested measures), or (ii) to refuse to comply with your request.

In what format will I receive a reply? If you submit your request electronically, the information will be provided electronically where possible, unless you request otherwise. In any event, we will provide you with a response that is concise, transparent, understandable and easily accessible.

When will I receive an answer? We will respond to your request as quickly as possible, and, in any event, within one month of receipt. Depending on the complexity of the requests and the number of requests, this period may be extended by two months if necessary. If the deadline is extended, we will inform you of this within one month of receiving the request.

What if Telenet does not respond to my request? We will always inform you in our response about the possibility of submitting a complaint to a supervisory authority.

9. How can I contact Telenet about my privacy?

❖ I want to exercise my privacy rights.

- **Are you a Telenet customer?** Register via My Telenet (launch your request [here](#)).
- **Not a customer, or never been a customer?** Then you can go to a [Telenet point of sale](#) or contact us via [this form](#).

❖ I want to manage my privacy level.

You can adjust your privacy level yourself:

- via My Telenet (launch your request [here](#));
- at one of [Telenet points of sale](#); or
- via our [Customer Service](#).

- ❖ **I want to report a privacy breach to the Data Protection Officer.**
Report a privacy breach using [this form](#).
- ❖ **I have another question about the processing of my personal data.**
If you have a question about the processing of your personal data and cannot find the answer in this privacy policy, please contact us using [this form](#) and mention the word 'privacy' in the title.

You can also send your question, complaint or request by letter to the attention of the Data Protection Officer (or "DPO"):

Telenet BV
Liersesteenweg 42800
Mechelen

10. Keep up to date with changes

Telenet may amend this privacy policy from time to time, for example in response to market developments and new processing activities by Telenet. We therefore invite you to always consult the latest version of this policy on our website (<https://www2.telenet.be/en/privacy/>). We will, of course, inform you in advance of any significant change via our websites or other common communication channels and, when required by law, we will ask for your prior consent for our (new) processing activities.

In case of any contradiction, our general conditions and the special conditions that are applicable to specific Telenet products and services take precedence over this privacy policy.

11. Escalation to the supervisory authority

The Data Protection Authority is an independent body that ensures that your personal data is processed in accordance with the law. If you have a complaint in connection with the processing of your personal data by Telenet, or if you wish to initiate a procedure for mediation, you can contact the Data Protection Authority via <https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>.

Last update: October 30, 2023