

Telenet Privacy Policy

General

We view protecting your privacy as a matter of the utmost importance. We would like to keep you informed as best as possible, respect you and give you control over what happens to your personal information. Set out below you will find information about what data we collect, why we do so, how long we keep it, what your privacy rights are and how you can exercise these rights.

1) Who is protected by this privacy policy?

This privacy policy only applies in respect of the personal information, which we process as the data controller (see point 2 of this privacy policy).

It applies in respect of processing personal information of our (private and business) customers in relation to our telecoms products and services (including mobile or landline telephony, mobile or wired internet, radio and/or television), as well in respect of the personal information of the end users, who utilize these Telenet services and products through their relationship with our customer (for example: family members, friends, visitors and employees).

This privacy policy furthermore applies to personal data processed when you pay a visit to our offices or points of sale, web sites, use our mobile apps, take part in market research, a survey, competition, campaign or event, log in to our Telenet Wi-Free or use our products and services in any other way. The personal information of ex-customers and prospects are handled and secured as effectively and carefully as possible, in accordance with this privacy policy.

2) What does 'processing personal information' mean and who is responsible for this?

A. Definition

'Processing personal information' is understood to mean *any* processing of information, which may identify you as a natural person. Which information this exactly involves you can read in point 3 of this privacy policy. The term 'processing' is broad and, amongst other things, covers the collection, capture, organization, retention, update, editing, querying, consulting, using, distribution or disclosure in whatsoever form, collation, combination, archiving, deletion or eventual destruction of this information.

For complete clarity, the processing of personal information of business customers only occurs if the business customer is a natural person, or - if the business customer is a legal entity - then the privacy policy only applies in respect of the personal information of the natural persons, which we process within the framework of their relationship with the business customer (such as authorized representatives, contact persons and/or end users).

B. Data controller

Telenet BV/SRL, with its registered office at Liersesteenweg 4, 2800 Mechelen, and registered in the Crossroads Bank for Enterprises (CBE) under number 473.416.418 (hereinafter referred to as “Telenet”) is the data controller of your personal information. This means that Telenet determines the objectives and resources used to process your personal information. This does not detract from the fact that you have also a number of obligations in connection with the processing of personal information of the end users, whom you allow to utilize your Telenet products and services (see point 2C of this privacy policy).

C. Your responsibilities towards end users

If you, as a Telenet customer, allow end users (such as family members, friends, visitors and employees) to utilize the Telenet products and services, which fall under the application of this privacy policy, then you have the following responsibilities in relation to this:

- you must adequately inform end users that Telenet will process their personal information based upon their use of the Telenet products and services;
- you must obtain all legally required consents from end users before their personal information is passed on to Telenet to be processed as part of Telenet products and services, which you allow them to use;
- you must adequately inform end users about the applicability of this privacy policy, in particular in relation to privacy rights and how these may be exercised (see point 8 of this privacy policy);
- you are not permitted to use the Telenet products and services to collect personal information, which contravenes the valid privacy legislation, nor to illegally provide yourself with access to the personal information of end users;
- you must find out from Telenet to determine the security level of the Telenet products and services and, at your own discretion and in line with your own capability, take appropriate technical and organizational measures to adequately protect the personal information against unauthorized or unlawful processing and against unlawful or unintentional destruction, unintentional loss, falsification, unauthorized distribution, damage, change, unauthorized access or disclosure;
- you must take all reasonable measures to safeguard the integrity of the end users, who have access to the personal information.
- you are not permitted to do, cause or allow anything, which may in any way result in any breach of this privacy legislation.

D. Your responsibilities towards third-party services

Through our Telenet products and services you can also utilize services of other parties, such as chat, third-party web sites, forums, Facebook, Twitter, newsgroups and/or apps. Telenet does not have any control over the information, which you post on these and how it is processed, and neither are we responsible for it. It is up to you to use it sensibly and to effectively comply with the privacy policy of these third parties.

3) What personal information can we process?

A. The personal information, which you share with us

We process the personal information, which you yourself pass on to us. This may be by telephone (for example, when you call customer services with a question or wish to report a fault), in writing (for example, when you fill in an order form (online), you send us a text message or e-mail, you register for a competition or download a Telenet app), electronically (for example, when reading your e-ID when you enter into a contract) or verbally (for example, in one of the Telenet points of sale).

B. The personal information, which our systems collect

We assign to you personal information for using our products and services (for example, a digibox number, an e-mail address, an IP address, a telephone number, customer number, log-in code(s) and passwords). In addition, our systems also record personal information, which is generated while you are using our products and services (for example, the television programs that you have watched or the identification numbers of the devices linked to your Telenet internet connection), including use by end users (for example, visitors who are linked to your Telenet Wi-Free).

C. The personal information, which we obtain from third parties

We purchase from specialist big-data companies (such as Bisnode) socio-demographic data and consumer information (for example, your family composition and residential information) to better customize our service provision to your needs. Furthermore, we receive from the DNCM not-forprofit organization periodic summaries of individuals, who are on the 'Do-not-call-me list' (for more information about this, see point 7 of this privacy policy). We receive consumer preferences (for example, that you like to go to the movies) through our market research agencies (such as CheckMarket). Other examples of personal information, which we obtain from third parties, include, for example, credit ratings on prospects, which we obtain from credit reporting agencies, or data relating to your mobile usage abroad, which other telecoms operators pass on to us so that we can correctly invoice you. The company that transfers your personal data is responsible for having the appropriate legal basis for processing personal data and for transferring it to us so that we can use it for our own purposes. We do, of course, ensure that these companies, as well as we, respect the guidelines of the privacy legislation.

We may also obtain personal data from affiliated companies within the Telenet Group (e.g. Liberty Global BV/SRL and Telenet Group BV/SRL), for example to inform you about products and services of the entire Telenet Group. The transfer of personal data is in the legitimate interest of the Telenet Group and only takes place for purposes that are compatible with the purpose for which the personal data were originally collected. In this context, the companies within the Telenet Group qualify as separate data controllers, and the data processing agreements are laid down contractually between the respective companies.

D. Categories of personal information

We distinguish in our systems between different types of personal information, which can be combined with one another:

- User data: we distinguish between the personal information, which you as a user of our products and services are able to identify (for example, you took an identification document such as a copy of the front of your identity card), the personal information, which allows us to contact you (for example, your address, your e-mail address and your telephone number), the personal information, which designates your personal characteristics (for example, your age and your gender) or your lifestyle and consumer habits (for example, your family composition) or relate to your invoicing and payment data (including the data relating to your creditworthiness) and all other preferences, which you disclose through your settings on My Telenet (for example, your privacy level) or via your Telenet decoder (for example, your opt-out for recommendations of TV programs), our customer services (for example, your language preference), shops, social media, campaigns, web sites and mobile applications, competitions, etc.;
- Technical data: we need this to be able to ensure the smooth operation of our products and services. For example: the model and service number of your Digibox or the software version, which you use in one of our apps;
- Traffic data: we need this particularly technical data to route your traffic over electronic communication networks, such as your IP address or MAC address;
- Location data: using this data we are able to determine the location of your SIM card. Location data indicates which transmitter mast is being used or Wi-Fi point your mobile device or tablet is connected to. We use this data for network planning and management as well as, for example, for passing on your location in the event of emergency calls or as part of a police or judicial investigation;
- Data about your usage: the data, which we receive when you use our products and services. For example: the (mobile) telephone numbers called, the date, the time, the duration and the location of a call or internet connection, how you use our newsletters or web sites or data relating to the use of our TV services (such as which films you view and order from our TV library, what you record, pause, fast-forward and rewind or watch on catch-up, what your favorite TV channels are or which apps you have recently used on our decoder). We use this data, amongst other things, to be able to correctly invoice you as a customer and to offer you an improved and personalized experience. Information regarding the use of our websites and mobile apps is further explained in section 10 of this privacy policy.
- Cookies: we use cookies when you open our emails and/or when you visit our websites or mobile apps. Cookies are pieces of information that are stored on your own computer or mobile device and that are usually used to optimize the ease of use of websites and apps. For more information about cookies, please refer to our [cookie policy](#).

As stipulated by law, we do not process any sensitive data including data about your racial or ethnic origin, political views, sexual preferences and health.

E. Personal information of non-customers

Through various channels, such as for example competitions, promotions/campaigns, our web sites/apps and by purchasing data from specialist big-data firms, we are able to collect personal information about people, who are not (yet) customers of Telenet with the intention of making the most relevant offer possible to these people for Telenet products and services. In so doing, we guarantee your right to information and - insofar as is applicable - in conjunction with your eventual

legally required consent contractually enforce this in respect of third parties, who might collect your data (on our behalf) within this context.

4) What are we using this personal information for?

A. Proportional processing

We process personal information for a variety of purposes, and in each case we process the data, which is required to achieve the intended goal.

In this way we use personal information when this is necessary:

- as part of the preparation, implementation or termination of our contract;
- to meet the statutory or regulatory provisions to which we are subject; and/or
- for the furtherance of our legitimate interests, in which case we are continuously striving to achieve a balance between that interest and respecting your privacy, in particular if you are a minor (read more about this in point 7 of this privacy policy).

If processing your personal information is not necessary for one of these three reasons, then we always ask for your consent to be permitted to process your personal information.

B. Our processing activities

We collect personal information for the following specific purposes:

- **For handling your request for our products and services.**
If you visit our web site to collect and/or request information about our products and services or if, for example, you sign up for our newsletter, then we actually need your address details. All information, which we receive about you during this pre-contractual phase, we only use to provide you with the requested information, in the way that you want. Furthermore, if you eventually decide to become a customer of Telenet, we will ask you for a number of items of personal information for managing our contractual relationship, such as your name, address, telephone number, e-mail address, copy of the front of your identity card and will also assign data to you such as a customer number and log-in details.
- **For providing you with the best service and informing you of potential applications available to you.**
We use your data to set up, maintain and support your products and services and for our customer administration and dispute management. For example: we use your data to establish your connection and transfer the communication via our network and that of other operators, to facilitate voice control functionality on our decoder (you can opt to give your TV spoken instructions rather than using your remote control), to send invoices and to handle fault reports or complaints. We can also point you towards new functions (such as 'swipe to TV') or, based upon your TV viewing behavior, recommend a film within your package or a paid film in the TV library on your TV screen, your tablet, computer or on your mobile telephone via push messaging. By recording certain telephone conversations with our customer services, we are able to train our staff and continue to improve the service.
- **To optimize our network.**

We are responsible for maintaining, planning and improving our network such as routing traffic, resolving faults, monitoring peak and excess load situations. By analyzing network usage (for example the number of mobile telephones, which are linked to your Telenet WiFree) we obtain essential information about usage and the load on our network.

- **To continue to improve our products and services.**

We are able to process the data about your usage to evaluate and improve our range of products and services. For example: we look at which type of hardware you have to optimize the use of our apps or to check the quality of your internet connection. In this way we are able to more effectively tailor our products and services to you.

- **To provide you with information about (new) products and services from our and other companies within the Telenet group.**

We can use your information to offer you (in writing, by telephone or electronically) new products, services or special campaigns, which we think may be of interest to you. For example: you may receive a text message as soon as your bundle runs out with a proposal to move over to a new price plan. It is also possible that we may approach you if you are no longer a customer with Telenet, up to a maximum of 2 years after the end of our business relationship. Your privacy setting (more on this in point 7 of this privacy policy) determines to what extent you receive these kinds of messages, and how you can subscribe to and unsubscribe from them.

- **To offer you personalized TV advertising.**

Based upon your profile, we are able to adapt the standard TV advertising to your interests and preferences on a number of TV broadcasters that we work together with. The combination of user data (for example, your age, language, post code, product mix and sociodemographic data such as family composition and street-level statistical data) and your data about your usage (namely your TV viewing behavior) allow us to personalize your TV experience. Your privacy setting (more on this in point 7 of this privacy policy) determines to what extent you receive this kind of advertising, and how you can subscribe to and unsubscribe from them.

- **To combat fraud and infringements.**

If you become a customer with Telenet, we will ask you for the front of your identity card so that we can determine who you are and thus be able to avoid identity theft. Depending on the Telenet products and/or services that you choose, we will also check your creditworthiness. We conduct this check to prevent you entering into obligations with us, which you are not able to support financially. We also want to avoid Telenet accounts remaining unpaid. For this purpose we can request information from internal and external databases, as previously explained under point 3 of this privacy policy.

- **To guarantee security for everyone.**

In and around our offices and buildings you will also be filmed by our CCTV cameras. These images are only stored for the purpose of security of property and persons and to prevent abuse, fraud and other violations to which our customers and we, ourselves, may fall victim (we indicate the presence of cameras using icons, which state our contact details).

- **To monitor our performance.**

We can use your data and profile to evaluate our products and services. We do so, amongst other things, based upon feedback from customers about our services (for example, through market research), data, which we obtain during a conversation with or our intervention with customers, customers' questions, recording telephone calls by our customer services (this is stated at the start of the conversation).

- **To meet our statutory obligations.**

In many cases we are legally obliged to keep certain personal data about you and/or to share it with government bodies. In addition to general fiscal and accounting obligations, we need to pass on your detected location, for example, to the emergency services when you call 112 (even if you have blocked your caller number display), to use your mobile telephone number and location data from the mobile network in order to send to you text messages at the request of the competent authority to warn you in case of impending danger or large-scale disaster and to keep your telephony and internet data for at least 12 months. As part of a police or judicial investigation, we are obliged to pass on certain data to the necessary authorities confidentially. We also work at countering malicious calls at the request of the Ombudsman Service for Telecommunication.

- **To update studies, tests and statistics for trend analysis, amongst other things.** We can use your data, for example, to report internally and externally on the use of our services, for instance, how many specific programs or broadcasters are being watched. We use the information we obtain from these studies and analyses to evaluate our current product and service portfolio and our processes in order to adapt them to new developments. Data that is reported externally is completely anonymized, which means that the data cannot be traced back to a specific individual. developments.

C. Automated decision making

Telenet does not undertake automated decision making - based on or not based on profiling - with which legal consequences are associated for you or in which case any such decision affects you to a significant extent, unless:

- this is necessary for entering into or implementing your agreement (for example, creditworthiness check or terminating your Telenet products and services in case of nonpayment);
- this is permitted by law (for example, for detecting tax fraud): or - we have obtained your express consent for this.

In such situations you are informed beforehand about the automated decision that has been made, that you are entitled to demand human intervention and the way in which you are able to contest the decision.

5) How do we protect your personal information?

A. Our technical and organizational measures

We work hard to protect your personal information and privacy, both in our offices, in our stores, in our network and in your home.

Our staff are trained in how to correctly handle confidential data. As part of any project the aim of which is to process personal information, an assessment is first made in relation to security and the protection of personal information, in which case your interests take precedence. Our information

security policy, our security requirements, and management standards are incidentally based in full on the international ISO27002 standard. To protect your data we have employed specific individuals, who oversee compliance with legislation and our ethical conviction, as set out in this privacy policy. We have also employed specialist individuals, who are responsible for the security of our network, our infrastructure and our information systems. Furthermore, we use all kinds of technical measures to protect your personal information against unauthorized access, unauthorized use and loss or theft of your data, such as: password protection, hard disk encryption software, firewalls, anti-virus, intrusion and anomaly detection and access checks for our employees. Should a data leak occur with negative consequences for your personal information, then you as a customer are personally informed of the circumstances as provided for by law.

The software on our products is constantly kept up-to-date. In addition, we offer you individual security settings, which you yourself can manage, such as: a password on your television, a filter on your e-mail inbox and a firewall on your desktop or laptop.

The number of employees in our company that has access to your personal information is restricted and our employees are carefully selected. They are only granted access to your personal information insofar as they require this information to complete their duties properly.

B. Telecommunication secrecy

Your personal communications are confidential. We are able to process metadata (i.e. the data, which is processed to technically facilitate the communication), but the existence and the content of the personal communications, which pass over our network (for example: landline and mobile telephone conversations, e-mails and text messages) are protected by provisions governing telecommunication secrecy. Telecommunication secrecy means that, outside the exceptions summarized by law, Telenet is not permitted to have knowledge of the existence or the content of such communication. Telenet has taken the necessary security measures and given adequate instructions to its staff to observe telecommunication secrecy.

6) Do we sell your information to third parties or do we pass on your information?

A. Data transfers

We do not sell any personal information to third parties without your consent and we do not pass it on to third parties unless:

- **It is to our legal successors and other companies within the Telenet group.**
We pass on your personal information to any of our legal successors and affiliated businesses within the Telenet group (for example, Liberty Global BV/SRL and Telenet Group BV/SRL) for the same purposes as is stated in this privacy policy, in order, for example, to keep you informed of the products and services throughout the whole of the Telenet group. In case of nonpayment, we can also pass on your payment habits to protect the legitimate interests of the Telenet group. In this context, the companies within the Telenet group qualify as separate data controllers, and the agreements regarding data processing are laid down contractually between the respective companies.
- **This is necessary to provide our service.**

We make some of our databases accessible to third parties, who work on behalf of us and who support us in delivering our products and services. Take, for example, our commercial agents, the self-employed technicians, which maintain our network and the (external) customer services employees, who support our customers daily. We also use a third party (Doccle) to manage our legal archives (e.g. for invoices). The transfer of your data only takes place for those purposes for which Telenet processes your data itself and is limited to that data, which they need to perform their job on our behalf. We ensure that, as we do, they manage your data securely, respectfully and as a trusted guardian and we provide adequate contractual guarantees for this purpose. • **There is a statutory obligation.** We refer to point 4 of this privacy policy.

- **There is a legitimate interest for Telenet or the third party involved.**

We will only pass on your personal information if your interests or your fundamental rights and freedoms are not preminent and you will then always be transparently informed about this (except in case of statutory exceptions). Thus your personal information may, for example, be passed on to credit reporting agencies, debt collection agencies and legal services, as well as to partners with whom we work as part of a specific campaign (for instance to a travel agency, for a Telenet competition in which you might win a city break). Personal data is also passed on to other telecom operators to enable network interconnection (connection to electronic communication networks of other operators), as well as its administration (invoicing and settlement between operators).

- **You give us consent to do so.**

If Telenet were to provide other third parties with personal information in other situations, then this is done with an explicit notification in which an explanation is given about the third party, the purposes of the transfer and data processing. Where legally required, we obtain your express consent. Example: according to your choice when entering into a contract, your required subscription information is passed on and recorded in the telephone directory and/or in the directory enquiries file.

B. International processing of your personal information

Insofar as personal information (on the occasion of data transfers set out in point 6A of this privacy policy) is processed outside of the European Union, through contractual or other measures we ensure that this data is granted an appropriate level of protection there comparable with the protection, which it would be granted within the European Union, in accordance with European regulations.

A few examples:

- Access to our customer database and mediation tools by external call centers (e.g. in Morocco, for our French-speaking customers)
- Maintaining certain software tools (which contain personal information) by external IT consultants (e.g. in India).

C. Use of anonymous data

We use anonymous, aggregated data for commercial purposes and internal/external reporting. This data can never be traced back to a specific natural person. Some examples: location reports (*'how many people were in a particular place at a specific time'*) for event organizations, supermarkets and towns/villages, viewing statistical reports for TV broadcasters for determining the popularity of

certain programs, for example. Telenet in each case guarantees that all of these parties are never able to trace the data received by us back to an identifiable natural person. Note that transfer of anonymous data only takes place as from privacy level 2 (see point 7A of this privacy policy).

7) How do you determine which personal information we are permitted to use for commercial purposes and how?

A. Telenet privacy settings

Each private customer as well as every business customer, which purchases Telenet products and services that are intended for self-employed individuals and small businesses, is able to determine him/herself based on a number of settings how he/she thinks that we may use his/her personal information for commercial purposes. Within the framework of specific telecommunication products and services, certain end users can also create a personal log-in. Anyone using this facility is able to manage his/her privacy settings in the same way.

The processing of personal information can thus be divided into 4 levels:

○ Level 1: General

We use your data to provide you with an outstanding service and general communication about the products, which you have from us or which may be of interest to you. At this level the data stated in point 3 of this privacy policy (user data, technical data, traffic and location data, data about your usage, cookies (insofar as you haven't disabled them) and externally purchased data) is processed within the framework of our statutory obligations, our legitimate interests and due performance of your contract (including complaints - as well customer management, and providing information about and enhancing the network and the provision of services). You opt not to receive any direct marketing, but Telenet, of course, continues - based upon its legitimate interests - to inform you about how best to use the products and services that you already have. In this way, for example, we can offer you a 'Helemaal Mee Tournee' or, if you exceed your data limit, we can make you a price plan proposal, which is better in line with your needs.

With this level you stipulate that Telenet is not allowed to process traffic data or sales profiling on you for the general commercial purposes substantiated at this privacy level. For the purposes of complete clarity, we continue to profile to the extent that this is necessary as part of preparing, performing or terminating our contract in order to meet the statutory or regulatory provisions that we are subject to and for the furtherance of our legitimate interests. In the case of the latter we always endeavor to achieve a balance between those interests and respecting your privacy, particularly if you are a minor.

Unless you have set your decoder up differently, your TV viewing behavior will be used to recommend programs to you, which may potentially be of interest to you. Your TV viewing behavior is not used at this level to present additional products or services to you and you won't qualify for TV advertising adapted to your preferences and interests. You will thus only get the standard TV advertising.

At this level, no location data will be shared with third parties, not even anonymized as explained in section 6C of this Privacy Policy.

○ Level 2: Focused

If you become a Telenet customer from 25 May 2018 (the date of entry into force of the General Data Processing Regulation, or the “GDPR”), this level 2 standard will apply to you by default. You can always increase or decrease this level in your privacy settings. If, for example, you move to level 1, then we will only send you general commercial communication the legal basis of which is in Telenet’s legitimate interests, to inform you in particular of the optimal use of Telenet products and services that you already have. In any case, no more traffic data will be processed or sales profiling will be used for commercial purposes, based upon your choice in favor of level-1 privacy.

At level 2 we do the same as at level 1, but over and above that our commercial communication becomes more focused. We also include your traffic data, TV viewing behavior and sales profiling to customize our communication to your preferences and interests. This information is only, however, used for direct marketing for equivalent products and services from Telenet itself. This means that we, for example, can send you an e-mail if a new season of your favorite TV series is about to come out, or you may receive a promotion for our sports entertainment package if we notice that you are interested in sports programs or sports reports. You will continue to only get the standard TV advertising.

As from level 2, location data can be passed on to third parties, but only if they are completely anonymized. More information about the use of anonymous data can be found in section 6C of this privacy policy.

○ Level 3: Personal

If you became a Telenet customer before 25 May 2018 (the date of entry into force of the GDPR), then you are enabled by default for level 3 unless you yourself might have updated your privacy setting to a higher or lower level. Moreover, you can always increase or decrease your privacy level. If, for example, you move to level 2, your TV viewing behavior will no longer be used for adapted TV advertising. Your TV viewing behavior is still processed at this level to keep you commercially informed about (other) Telenet services in a more personalized manner. If you further lower your privacy setting to level 1, then your TV viewing behavior will no longer be processed for general commercial communication, which you then receive from us. . Unless you have set your decoder differently, your TV viewing behavior is only used to recommend programs to you, which may potentially be of interest to you and/or insofar as we are legally obliged, or insofar as the processing of this information is required for the purpose of invoicing and reporting.

At level 3 you are opting for a personal TV experience. We also use your data to customize the TV adverts that you are shown to the preferences and interests of you (and your family). If, for example, you fanatically watch athletics, then you are more likely to fairly quickly see an advertising commercial about sports items.

The collected data about your TV viewing behavior is only used as from this level to show focused TV advertising (as opposed to standard TV advertising). For this purpose we otherwise ask for additional data (for example, socio-demographic data relating, amongst other things, to you as a customer and/or your family, as well as statistical data at neighborhood and street level and consumer information) from an external supplier (currently: Bisnode; more information: www.bisnode.be).

○ Level 4: Unique

At level 4 you are opting for a completely personalized experience in the sense that we also process data about your internet usage. We do everything we can to customize to the maximum extent both

the communication, which you receive from us, and the advertising commercials that you see on the TV to your preferences and interests.

Thus only in respect of customers, who have actively opted for this level, certain aspects of their web surfing behavior (e.g. areas of interests that are deduced based on categories of web sites visited) are added to their profile and used for commercial communication.

Maybe, for example, you have spent some time online searching for an affordable hotel in Berlin? Then we can provide you with tailor-made attractive offers or send additional information about how and where you can surf the internet free of charge abroad. Furthermore, you may also receive focused TV advertising for sports items, for example, because we have noticed that you are often browsing sports web sites.

In summary: other than by means of cookies etc. (provided you haven't disabled them, more information about cookies can be found in our [cookie policy](#)) or unless you have actively opted to do so (by activating the "Unique" level), Telenet does not process any information about your web browsing behavior. Unless legally obliged or out of necessity for the provision of the service (for example, as part of quality research by our customer services), we never further process the content of your personal communication (e.g. telephone call, text message, e-mail, chat or social media).

In practical terms you can contact Telenet customer services about your choice of level as well as the Telenet points of sale or change the settings yourself in the section "My Privacy settings" on My Telenet. Your change to a privacy setting can take (max. 72 hours) and does not affect the legitimacy of instances of previous data processing. If we want to collect your personal information for specific purposes, then we will always inform you about this, and where legally required request your consent, in the communication, which we disseminate about this.

B. Minors

Telenet conducts a strict policy regarding the processing of personal information of minors. If we know or need to know that you are younger than 16 (for example, within the context of creating a personal log-in), your personal information will always be automatically processed according to the most restrictive privacy level (privacy level 1 - "General"). Otherwise, insofar as is legally required, Telenet shall request the prior consent of your parent(s) or guardian.

C. Opt-out for direct marketing

You are always entitled to oppose the use of your personal information for direct marketing purposes without having to specify a reason for this.

If you wish to choose the media through which you receive our marketing (e.g. only by e-mail), you can always contact the Telenet customer services or visit one of our Telenet points of sale and disable our feature to receive promotions and/or campaigns by telephone, post, text message or email. Everyone (including prospects) can also use the following external unsubscribe options:

- **if you no longer wish to receive any commercial telephone calls**: register with the so-called 'Donote-call-me-list' (www.dncm.be). As co-founder of this service, Telenet will also take this into account, even if you are already one of our customers.

- **if you no longer wish to receive any commercial mail**: register with the so-called Robinson list (www.robinsonlist.be). As a member of the Belgian Direct Marketing association, Telenet takes account of this when approaching non-customers. If you also do not wish to receive any advertising by post as a customer, then you should contact the Telenet customer services or visit one of our Telenet points of sale.
- **if you no longer wish to receive any commercial text messages**: respond with "STOP" to the number that sent you the text message;
- **if you no longer wish to receive any commercial e-mails**: use the unsubscribe option in the intentional e-mail. To make e-mail campaigns more efficient, we use software to measure whether our e-mails are opened and which links are clicked;
- **if you want to unsubscribe from newsletters and/or magazines**: specify, using My Telenet, which newsletters you no longer wish to receive. You can also unsubscribe from the newsletter or magazine in question using the unsubscribe option in the newsletter or magazine.

If you no longer wish to receive any form of commercial communication, please exercise your privacy right "right to object" via My Telenet. If you do not have a My Telenet or you are not a customer, we will be happy to help you in our Telenet points of sales. More information about your privacy rights and the formalities for exercising your rights (e.g. verification of your identity) can be found under point 8 of this privacy policy.

We will only send commercial communications to web site users, who are not Telenet customers, via text message and/or e-mail after they have given their unambiguous consent for this.

Note: the fact that you no longer wish to receive any commercial communications from us does not, of course, affect our right to contact you electronically as part of the performance of your contract or if the law obliges us to do so.

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

A. Overview of your privacy rights

○ Your right of access

You are entitled to find out from Telenet at any time whether or not we process your personal information, and if we do process it to have access to this data and to receive additional information about:

- the purposes of the data processing;
- the categories of personal information involved;
- the recipients or categories of recipients (in particular, recipients in third-party countries);
- if possible, the retention period or, if that is not possible, the criteria to determine this period;
- the existence of your privacy rights;
- the right to submit a complaint to the supervisory authority;
- the information that we have at our disposal about the source of the data if we obtain personal information via a third party; and
- the existence of automated decision making.

You are also entitled to receive a free copy of the data being processed, in some intelligible form. Telenet can request a reasonable payment for covering its administrative costs for any additional copy that you request.

○ **Your right to update personal information**

You are entitled to have incomplete, incorrect, inappropriate or out-of-date personal information corrected without delay.

To keep your data up-to-date, we request that you notify us of any change whatever the circumstances, such as a relocation, change of e-mail address or the renewal of your identity card. In the meantime, we provide a periodic pop-up in My Telenet where you are prompted to update your contact details.

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

You are entitled to have your personal information deleted in the following instances, and without any reasonable delay:

- your personal information is no longer needed for the purposes for which they were collected or have otherwise been processed by Telenet;
- you withdraw your prior consent to the processing of data and there is no other legal basis that Telenet can invoke for (continued) processing thereof;
- you object to the processing of your personal information and there are no preminent, legitimate grounds for (continued) processing of data by Telenet;
- your personal information is being processed unlawfully;
- your personal information needs to be deleted to meet a statutory obligation; - your personal information was collected when you were still a minor.

Remember that we are not always able to delete all personal information that is requested, for example if processing it is required for instituting, exercising or substantiating a legal claim or because we are obliged on behalf of the judicial authorities and the State Security Services to retain data about customers' (mobile) telephone traffic for 12 months. We will inform you in more detail of this in our response to your request.

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

You are entitled to obtain a restriction on the processing of your personal information if one of the following elements applies:

- you contest the accuracy of this personal information: its use is restricted for a period, which enables Telenet to check the accuracy of the data;
- the processing of your personal information is unlawful: rather than deleting your data, you request its use to be restricted;

- Telenet no longer requires your data for its original data processing purposes, but you need it for instituting, exercising or substantiating a legal claim: rather than deleting your data, its use is restricted to instituting, exercising or substantiating the legal claim;
- while a decision has not yet been made about exercising your right to object against the processing of your data, you request that the use of your personal information be restricted.

○ **Your right to the portability of personal information ('data portability')**

You are entitled to 'recover' your personal information, for example to be able to change service provider more easily. This is only possible in respect of the personal information, which you yourself have provided to Telenet, based on consent or pursuant to an agreement. In all other cases, therefore, you may not enjoy this right (for example, if the processing of your data is based upon a statutory obligation).

There are 2 aspects associated with this right:

- you can invite Telenet to recover the personal information in question in a structured, current and machine-readable format; and
- you can request that Telenet directly pass on the personal information in question to another data controller. In so doing, you yourself are responsible for the accuracy and security of the (e-mail) address, which you specify for the transfer. Telenet is entitled to refuse to do this if the transfer is not technically feasible.

○ **Your right to object against the processing of your personal information**

You are entitled to lodge an objection against the processing of your personal information on grounds of your special situation if processing it is in line with Telenet's legitimate interests or in line with general interests. Telenet will discontinue the processing of your personal information unless Telenet is able to demonstrate compelling and legitimate grounds for processing it, which override your grounds or if the processing of personal information is associated with the instituting, exercising or substantiating of a legal claim (for example, submitting an appeal to a court of justice).

As regards your right of opposition within the framework of direct marketing, see point 7 of this Privacy policy.

B. Practical

How do I exercise my privacy rights? Via My Telenet (only for active Telenet customers) and the Telenet points of sale. To exercise your privacy rights, and to prevent any unauthorized disclosure of your personal information, we need to verify your identity. In case of doubt or unresolved issues we will first ask you for additional information (preferably a copy of the front of your identity card). The contact persons or authorized representatives of our business customers' legal entities, who only purchase Telenet products and services intended for large businesses and organizations, need to exercise their privacy rights via the account manager of this business customer. If we cannot confirm your identity with certainty, we will not process your request.

Are there costs associated with this? You can exercise your privacy rights free of charge unless your request is manifestly unfounded or disproportionate, in particular due to its repetitive nature. In such

a case - in accordance with the privacy legislation - we have the right and choice (i) to charge you a reasonable fee (in which case the administrative costs are taken into account to provide the requested information or communication and the costs, which are associated with taking the requested measures), or (ii) to refuse to follow up your request.

In what format do I receive a reply? When you submit your request electronically, where possible the information is provided electronically, unless you request it otherwise. In any case we will provide you with a brief, transparent, intelligible and easy-to-access response.

When will I receive an answer? We will respond as quickly as possible to your request, and in any case within one month of receipt of your request. Depending on the complexity of the requests and the number of requests, this period may be extended for a further two months, if required. In case of an extension of the period, we will notify you of this within one month of receipt of the request.

What if Telenet does not follow up my request? We will in each case inform you in our response about the option of submitting a complaint to a supervisory authority and lodging an appeal to the court.

Section 12 of this privacy policy explains how you can contact us.

9) How long do we keep your personal information?

We are not permitted to keep your personal information for longer than is necessary to achieve the purpose for which we are collecting it. The retention period may thus vary for each purpose, and sometimes be very short. Thus traffic data relating to communications and connections is never retained for longer than 12 months, your TV viewing behavior for a maximum of 36 months and your calls with Telenet customer services are kept for training purposes for a maximum of 30 days. Sometimes the period may also be longer, for example, to observe our statutory obligations (to meet our accounting and tax obligations, for example, we are obliged to keep your invoicing data for a maximum of 7 years) or as a legal requirement to retain certain data (in particular your contract, invoices and correspondence in connection with complaints about this) as evidence in case of disputes, for up to a maximum of 10 years following termination of your contract. This archived data is, of course, only accessible to a limited extent.

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

Certain data from previous customers may be used for a period of 2 years following termination of the contract to identify the previous customer and to notify them of new Telenet products and promotions, unless the customer indicates that they do not agree to this pursuant to the procedure set out under point 7E of this privacy policy.

10) Our web sites and mobile apps

If you visit our web sites and use our apps, then we process the following personal information pertaining to you:

- Your IP address, the type and the language of your browser, the software, the type and make of the device that you use when connecting to our web sites and apps, the time of the web site visit or use of the app and the web address from which you accessed our web site, the pages, which you view on it, the links that you click on and the other actions, which you perform on our web sites and apps. We do this using cookies. Further information about the cookies, which we use, and the options, which you can choose in them, can be found in our [cookie policy](#).
- On some Telenet web sites and apps, we ask you for additional personal information, such as your e-mail address, name, address or a telephone number. If you make a purchase or take out a subscription to a paid service, we ask you for additional information, such as your bank account number or number of an identification document. In addition, sometimes you will be asked for your profile or demographic information, such as your post code, age, gender, preferences, interests and favorites;
- When you log in to My Telenet then we prompt you for your username and password. We then identify your IP address and link this to your customer data. It's also good to know that your log-in session continues to remain active for 15 minutes after logging off.
- If our apps use your location, then we provide you with information about this and the option to disable these location services.

The personal information, which we collect via our web sites and apps, is used for the following purposes:

- To be able to provide you with our (web) services (for example, placing online orders) and for communicating with you (for example, in connection with your account or to send you a warning if phishing e-mails are circulating).
- For creating statistics and completing analyses for the purpose of improving the quality of our web sites and service provision. If, for example, we know that quite a lot of web site users are still calling the customer services in spite of a 'help' article on customer services, then we can learn from this and we can improve our online service provision.
- Some of our websites (e.g. www.digitaleversnelling.be or www.9lives.be) contain forums where members can post messages, articles, photos, videos, comments, likes, etc.
- To offer a more effective and personal service, for example, by adapting the adverts displayed on our web sites and the offer of our products and services to your personal preferences.
- To approach you with offers and information about other Telenet products or services.

11) How can I contact Telenet?

If you have a question about the processing of your personal data and you cannot find the answer in this privacy policy or our [online FAQ](#), please contact us using this [form](#) and include the word 'privacy' in the title. Are you a Telenet Business customer? Then you can use this [form](#).

To exercise your privacy rights (such as retrieving what data Telenet has of you or you want to see your data deleted) you as a customer can visit My Telenet. If you do not have a My Telenet or are not a customer, we will be happy to help you in our Telenet points of sales. More information about your privacy rights and the formalities for exercising your rights (e.g. verification of your identity) can be found in article 8 of this Privacy Policy.

If you wish to choose how you would like to receive our marketing (e.g. only by e-mail), you as (former) customer can always contact our customer service and change your communication channels (telephone, post, SMS, e-mail). Anyone (including prospects) can further use the external unsubscribe options mentioned in article 7 point c of the privacy policy.

If you no longer wish to receive any form of commercial communication, please exercise your "right to object" via My Telenet. If you do not have a My Telenet or are not a customer, we will be happy to assist you in our Telenet points of sale. More information about your privacy rights and the formalities for exercising your rights (e.g. verification of your identity) can be found in article 8 of this Privacy Policy.

If you want to report a privacy violation to the Data Protection Officer, you can use this [form](#).

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

Telenet BV/SRL
Liersesteenweg 4
2800 Mechelen

12) Keep up-to-date on updates

Telenet may amend this privacy policy from time to time, for example in response to market trends and Telenet's new processing activities... We will then always invite you to view the most recent version of this policy on our website (www.telenet.be/privacybeleid). Of course, we will inform you beforehand via our websites or other current communication channels about each significant change in content and we shall request your prior consent for our (new) data processing activities when required by law.

In case of any conflict, our general terms and conditions and the special conditions applicable in respect of specific Telenet products and services take precedence over this privacy policy.

13) Escalation to the supervisory authority

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

Latest update: 1 October 2020