Business

Annex to the Data Processing Agreement – Specific details of the personal data processing (*version 14 August 2025*)

In the context of the **Internet of Things** service, Telenet acts as a processor in accordance with the Data Processing Agreement (available at De algemene voorwaarden van Telenet Business | Telenet Business), and which is further detailed and supplemented with the following provisions:

- **Subject of the processing**: management of connectivity between IoT devices via the Connect Tinx platform.

- **Categories of personal data and of Data Subjects**:

Personal data category	Personal data sub-category	Personnel of the Customer	Other data subjects (e.g. customers of the Customer)
Identifying data	Contact details (e.g. e-mail, phone number, address)	X	X
	Generic details (e.g. name, gender, date of birth, place of birth, nationality, ID-card number)		
	National Registration Number		
	ID card copy (e.g. physical and scanned copy of ID-card)		
	Image or video recordings		
	Device identifiers (e.g. IMEI-number, MAC-address, STB ID)	X	X
	Online identifiers (e.g. IP-address, session ID, Cookie ID)	X	X
Socio-demographic data	Household information (e.g. civil status, dependants)		
	Lifestyle (e.g. consumption habits, hobbies, fields of interest, social media presence)		
Financial data	Financial identification (e.g. bank account number, credit card number, debit card number)		
	Shareholdership		
Communication data	Audio recording (e.g. conversations with customer service)		
	Transcripts of conversations (e.g., transcripts of conversations with customer service)		
	Campaign history (e.g. offer acceptance, response rate)		
	Communication preferences (e.g. channel preference, settings, consent settings, communication language)		

	Contact history (e.g. service requests, inquiries via mail/chat, incident logs, complaints, including social media)		
	Surveys and feedback		
GDPR sensitive information	Biometric data (e.g. fingerprints)		
	Genetic data (e.g. DNA)		
	Medical & health information (e.g. medical, psychological & health information)		
	Political preferences		
	Racial or ethnic origin		
	Religious & philosophical beliefs		
	Trade-union membership		
	Sexual orientation		
Contract data	Account details (e.g. Customer ID, username, password)	X	X
	Billing and payment details (e.g. payment history, payment method, invoice, invoice details)	X	X
	Commercial information on products and services (e.g. individual products portfolio, tariff plans)	X	X
	Technical and account information for the use of the products and services (e.g. STB model, app version, mailbox alias)	X	X
Content data	Cloud services (e.g. content uploaded/stored/ transferred on cloud services)		
	E-mail services (e.g. sender of e-mail, receiver of e-mail)		
	Online and social media (e.g. postings, comments, feedback)		
	SMS / MMS services (e.g. content of SMS/MMS)		
	Telephone services (e.g. content of voice calls)		
	Unstructured data (e.g. content stored on the handset of customers, content stored on folders, content stored on hard disc, etc.)		
	Voicemail recordings		
Location data	Geo-location (e.g. cell ID, GPS coordinates, wifi location, triangulation coordinates)		
Traffic and usage data	Viewing behavior (e.g. video XDR – viewing sessions)		
	Calling behavior (e.g. call detail records for telephony)		
	Internet behavior (e.g. DNS, URLs)		
	Aggregated traffic (e.g. stats derived from raw traffic data, such as number of calls, amount of internet used)	X	X

Telemetry & Behavioral data	Entertainment product usage (e.g. information related to the use of DB/DC, OTT media services)		
	Website & mobile apps usage (e.g. telemetry data generated when accessing mobile apps or websites)		
	Technical stats (e.g. packet loss, bad connection, etc)		
Profiling data	Viewing behavior profiling (e.g. profile derived from set top box usage)		
	Calling behavior profiling (e.g. high/low user)		
	Internet behavior profiling (e.g. gamer, streamer)		
	Propensity profiling (e.g. churn indicators, next-best offer indications)		
	Financial profiling (e.g. external credit scores, wealth indicators, housing information, bad payer status)		
Professional data	Career history (e.g. former employment info)		
	Compensations & benefits (e.g. salary, benefits, assets provided to the employee, timesheets)		
	Current employment (e.g. title, role, seniority, recruitment date, former positions, work schedule)		
	Education & training (e.g. certifications, diploma's, additional training)		
	Insurance policy details		
	Logging and monitoring data (e.g. evaluation of the use of technology)		
	Membership in professional organization		
	Pension plan details		
	Public mandates		
	Work permit		
	Performance management		
	Criminal justice information (i.e. extract judicial records)		
	Disciplinary records (i.e. HR information related to disciplinary records, disciplinary proceedings)		
	Curriculum Vitae (i.e. physical or digital copy of the CV)		
	Recruiting information (i.e. application status, candidate progress, etc)		

- **Purposes for which the personal data is processed on behalf of the Customer**:
  - ☐ Customer Segmentation
  - ☐ Marketing & Sales activity
  - ☐ Support to Regulatory Requests
  - ☒ Service Delivery and Customer Support
  - ☐ Fraud Management
  - ☒ General Product, Service and Network Management
  - ☐ Corporate Affairs
  - ☐ Anonymized reporting for third parties
  - ☐ Supplier Management
  - ☐ Cyber Security
  - ☐ Employee Administration and Management
  - ☐ Physical Security
  - ☐ Other: *[complete]*

- **Nature of the processing**: hosting, storage, remote access, support

- **Duration of the processing:** during the term of the service provision, but always subject to the Customer's instructions

- **Subprocessors**:

Sub-processor (statutory entity name, register number and address)	**Subject matter** (description of the service)	**Location**	**Safeguards** (adequacy decision, standard contractual clauses, binding corporate rules, contractual provisions)
Pareteum NV BE0468.433.091 Vaartdijkstraat 19 8200 Brugge, België	Development of the online management platform for IoT connectivity	Belgium	Contractual provisions (data processing agreement)