



Privacy policy

It is important for us that you have the confidence to let us manage and store data about you, that you are aware that we do it legally and reliably and how it works.

This is our privacy policy - we always protect your privacy!

Data and how we handle it

Data is information we collect and store about you and how you use our services.

We use this information to provide you with good services and offers.

What kind of data we collect

We collect two types of data about you - customer data and traffic data.

Customer data is information connected to your service - e.g. name, address, e-mail address, phone number, social security number. It may also be information about what services you have and how you use them, orders, user ID, passwords and other information you provided in your contacts with us.

Traffic data is information related to what happens when you use our services. Traffic data is processed for the purpose of transmitting an electronic message via an electronic communications network when using your services (for example, when you make a call, send text message or send an e-mail). There is also data for billing for this message or for interconnect traffic. Examples are who communicated with who, the time when communication began and ended, the total time of communication, and the networks used. Traffic data is also information about where you are when you call or are connected - for example, which IP address you are connected from.

How we collect data

We collect and process data that:

- you provide yourself when you become a customer with us and when you communicate with us - for example when you enter into agreement, contact us for information or subscribe to a newsletter.
- is created when using any of our services - e.g. When you visit our website, call, send text messages or email.

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- we get from other sources - e.g. publicly available personal registers such as SPAR, records used for credit assessment as UC, and from other operators and partners.
- is collected by our web pages using cookies that collect information from your browser.

What information we collect about you depends on which of our services you use.

What we use data for

To process data, there must be support in current data protection regulation, a so-called legal basis. This means that in order for our processing of your data to be legal, it is necessary (1) to fulfill the agreement with you or (2) to fulfill an obligation for Efftel's legal obligation. The processing of your data may also be done (3) after a balance of interest or (4) when you have given your consent to the particular processing.

In order to provide services and products, we need to process and manage your data.

Below are examples of the purposes for which we process your data and on which legal basis we do this.

Provision of services

We process data to identify you as a customer or user, to handle and deliver orders in accordance with your agreement and to provide communications services – i.e. to ensure the operation of the service and to connect a call or send sms or e-mail to the recipient. We also process data to charge for the services you use and to manage your invoices and payments, for credit disclosure purposes, to correct errors and handle other incidents, and to handle complaints.

Legal basis: Fulfillment of agreement

Other communications about services

We also process data during other communications with you, such as when we send information about and are in touch with you regarding questions about our services. When you call our customer service, the call can be recorded. When you chat with our customer service, the written texts can be analysed. We do this to educate our employees, improve our response and our way of working so that we can help you in the best possible way.

Legal basis: Legitimate interest (customer data) and consent (traffic data).

Development of services

We process data to develop and manage our operations, services and networks as well as our processes. For this purpose, we may also compile statistics for analysis needs.

Legal basis: legitimate interest (customer data) and consent (traffic data).

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Direct marketing

We process different types of data in order to market our products and services directly to you. You can receive direct marketing via e.g. letter, phone, text message and e-mail. For this purpose, we may also compile statistics for analysis needs.

Legal basis: legitimate interest (customer data) and consent (traffic data).

Information security and to prevent abuse of services

We process data in order to meet the security of all our services and communications networks, to detect or prevent various types of illegal use or use that otherwise violate the terms of service. We also process data to prevent network and service abuse, and to detect and prevent fraud, virus attacks, etc.

Legal basis: Fulfillment of contract (customer data) and legal obligation (traffic data).

Compliance with laws

We process data in order to fulfill our statutory obligations.

Legal basis: legal obligation

How long we save data

We never save data longer than we need. Some data is deleted directly, others are saved for some time depending on what the data will be used for and our legal obligations.

- Customer data is saved as long as you are a customer of Efftel and thereafter no longer than 24 months after termination of the contract. Exceptions apply to such data that must be stored by law, e.g. Accounting.
- Traffic data is saved for billing purposes. In the case of unpaid invoices, the data is saved until the claim is settled. When the invoice is paid, the data is deleted after 6 months, except for data stored by law, for example accounting law or agreements e.g. statistical service.
- We also save traffic data to help you if something is wrong with the services we deliver. In order for us to continuously offer better services based on our customers' needs, we also save statistics based on these data. This data is saved for 6-24 months.
- In order to offer you attractive market deals based on your needs, we will save certain data, such as number of sent sms and dialed calls. We save the information for 24 months.
- In order to limit damage from and protect you against internet fraud, we save IP addresses so that we can search, block, and delete addresses and messages. IP addresses are saved for 6 months. Exception for when IP addresses are required to fulfill an agreement.
- Calls recorded by our customer service are stored for 14-28 days.
- Chat conversations with our customer support are saved for 60 days.



To whom we release your data

We may disclose your data to:

Subcontractors and other companies within Efttel who process data on our behalf

In different areas, we engage suppliers and, in some cases, our own companies within the Group, in order to deliver our services. This means that they also need some information about you as a customer. However, these parties may not use data about you for any purpose other than the provision of the service or under the terms that we specify.

Transmission to third countries

Some suppliers may have a part of their operations in countries outside of Sweden or EU / EEA (so-called "third countries"). If, in order to provide the service to you, we transfer your data to a supplier in such a third country, we take appropriate safeguards and ensure that the transferred data is handled in accordance with applicable law. There are countries that the European Commission has decided meet the level of privacy protection required.

Authorities

We are required, upon request by law and authority decision, to disclose the data resulting from the decision - e.g. to the police.

Emergency services

For calls to SOS Alarm.

Other operators or service providers that provide or participate in the provision of your services

When you call with us to a recipient in another operator's network - e.g. in the case of international calls, certain data may need to be provided to that operator for providing the service.

Other

If you have given your consent, we may also disclose your data to companies, organizations or individuals outside of Efttel - e.g. number inquiry services.

How we protect data

We are constantly working to protect our customers' integrity. Our security work includes protection of persons, information, IT infrastructure, internal networks, as well as office buildings and technical facilities.

Particular attention is devoted to information security regarding your data to prevent and detect that it is not spread to third parties or is lost. Access to your data is provided only to those who

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need it for their duties. Processing of data is logged and checked systematically. We are continuously working to combat spam and viruses.

You control your data

Certain data processing is based on your approval, so-called consent. You always decide which processing you approve and if you wish to withdraw your consent.

Note! In order to provide services and products, we need to process and manage your data. However, you are not required to provide your data to us. If you choose not to do so, we may not be able to provide all of our products and services to you.

Your rights

You are entitled to know what we are doing with your data - why it is being processed, the duration of the processing, who has access to it, and what consequences the processing will have. In May 2018, you will also have even more possibilities to decide on your data. Here are your rights. You will find contact information at the bottom of the document.

Right to access

You can request an excerpt where you clearly indicate what information you want us to share. We will answer your requests without unnecessary delay and within a month. If for any reason we cannot meet your wishes, a motivation will be provided. The extract is sent to your registered address.

Right to correction

We are responsible for ensuring that the data we process is correct, but you as a customer are also entitled to supplement missing and relevant data. If you find incorrect data about you, you are entitled to request correction of this. As soon as your data is corrected, we will inform those we have provided the data that this correction has taken place - except in cases where it would prove impossible or impose an excessive effort. We will also, at your request, inform you of whom the correction has been issued to.

Right to erasure

Customer data is saved as long as you are a customer of Efftel and thereafter no longer than 24 months after termination of the contract. Invoice information and invoice data are saved as long as necessary by law, i.e Accounting.

As a customer you have the right to get the following data deleted without unnecessary delay if any of the following conditions apply:

- If the data is no longer needed for the purpose for which it was processed.
- If the processing is based solely on your consent, and you recall this.

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- If the processing is for direct marketing and you oppose the processing of the data.
- If you oppose data processing that takes place after an interest weighing and there are no legitimate reasons that weigh heavier than your interest.
- If data has not been processed according to the regulations.
- If deletion is required to fulfill a legal obligation.

If data is deleted, we will notify those we have provided your data that this deletion has occurred. However, this does not apply if it proves impossible or imposing an excessive effort. We will also, at your request, inform you of who the information has been provided.

Right to object

You are entitled to object to the processing of your data based on interest-weighting. You must then specify what processing you are objecting to. If we consider such processing must happen, we must show that there are interests that weigh heavier.

If data is processed for direct marketing, you are always entitled to object to the processing at any time.

Right to restriction

Note, will begin on May 25, 2018.

You are entitled to request a temporary limitation on processing your data. The processing can be limited in the following situations:

- When you think your data is incorrect and you have therefore requested a correction with us. You may then request that processing of your data be limited while the investigation is in progress.
- When the data processing is illegal, but you oppose to have your data erased and instead request that the use of your data to be restricted.
- When you need your data to determine, enforce or defend legal claims, even if we no longer need your data for the purpose of our processing.
- Once you have objected to processing your data, we may continue to process your data during the time of the check.
- If the processing of your data is temporarily limited, we will inform those we have provided it to that this temporary restriction has taken place.

However, this does not apply if it proves impossible or imposing an excessive effort.

Right to data portability

Note, will begin on May 25, 2018.

As an individual you have the right to get and elsewhere use such data that you have given to us.

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This applies in cases where you have given your consent to the data processing or if the processing is required to provide you with services in accordance with the agreement you have entered with us. However, you are not entitled to move your data if we process this due to interest-weighting or legal obligation.

Notification of violation (complaint)

If you believe your data is being processed in violation of current regulations, please report it to us as soon as possible. You can also file a complaint with the Data Protection Authority (DPA).

Damages

If you have suffered damage because your data has been processed in violation of the applicable law, you may be entitled to damages. You may then seek indemnity from us or bring an action for damages in court. Such a request must be made in writing to us.

Cookies

Some of our web pages use cookies. These are small text files stored on your computer when you visit a website. Cookies are used for some features that improve our web pages for the user or provide us with statistics about the use of the site.

By law, everyone who visits a website should be informed about what cookies are used for. The user should also be given the opportunity to consent to cookies being used to store or retrieve data from i.e. mobile phone or computer. Most browsers allow you to block cookies.

Contact details

Controller, Efftel AB

Efftel AB is the data controller and is responsible for how data is being processed. We determine the purpose of data processing and how data shall be stored.

Efftel AB (org.nr 556661-8194)

Årstaängsvägen 9

117 43 Stockholm

Sweden

Phone: +46 8 5106 2700

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Contact to exercise your rights

Change approval of how we handle data

You can revoke your consent by calling our Customer Service.

Phone: +46 8 5106 2740

If you do not want any direct marketing

If you do not want us to contact you for direct marketing of our products and services via text message, please contact us by calling customer service.

Phone: +46 8 5106 2740

You can also notify us by letter. The request must be in writing and include full name, and any subscription number.

Efftel AB
Årstaängsvägen 9
117 43 Stockholm
Sweden

You can also choose not to be contacted by clicking "Unsubscribe" in the respective email or dial the number at the end of the text message.

Claim damages

If you wish to seek damages because you have suffered damage due to your data being processed in violation of the applicable law, you can report it. The application must be in writing and include full name, social security number and any subscription number.

Efftel AB
Årstaängsvägen 9
117 43 Stockholm
Sweden

Request access to data

Private individuals are entitled to receive information about what data we are processing about them. The request is made in writing and must be signed by the applicant and include the name and social security number. Send request to:

Efftel AB
Årstaängsvägen 9
117 43 Stockholm
Sweden



Extracts will be sent to the applicant's registered address within one month of the application being submitted to us.

Request correction of data

Call our customer service to request correction.

Phone: +46 8 5106 2740

Request data erasure

Call our customer service to request data erasure.

Phone: +46 8 5106 2740

Object to Data Processing

Call our customer service to object to data processing.

Phone: +46 8 5106 2740

Other rights

The right to limitation of processing and the right to data portability of data begins to apply in connection with the entry into force of the EU's new data protection regulation, also known as the GDPR, on May 25, 2018.

Other

This Privacy Policy applies when you use products and services provided by Efttel. It does not apply to any other company's website or services, even if they can be accessed through Efttel's network or services.

The privacy policy may be updated, and we will notify you at efttel.com/privacy.