



Data privacy information from Deutsche Telekom AG („Telekom“) for using the GCA App

General

Deutsche Telekom AG attaches great importance to protecting your personal data. We always inform you what personal data we collect, how your data is used, and how you can influence the process.

What data is recorded, how is it used and how long is it stored?

a) **At registration:**

To register for the app, please enter your first name, surname, e-mail address, user name, and password. These details are required for login to the HotSpots and will be stored on our servers for contract fulfillment purposes for as long as you are able to use the service.

b) **When using the app:**

When you use the app, our servers temporarily record the IP address of your device and other technical features, such as radio accessible Wi-Fi access points and the location of the device (Art. 6 (1) b GDPR). In this app you have the possibility to dictate text in addition to the entries via keyboard. The voice input (Google) or dictation function (Apple) is a functionality provided by the operating system of our app. When used, the speech is processed by a third party (e.g. Apple or Google) as a controller and the result will be delivered to our app and output it in the input field. For details about the functionality and how to enable or disable usage. Please contact the respective operating system vendor

The App will collect data necessary for the provision of the service. For the best possible connection establishment and service quality, as well as for troubleshooting, usage profiles of all app users will be evaluated. (Legal ground is Art. 49 (1) b GDPR). For this purpose, the following data will be collected by the Global Corporate Access App, and, into encrypted form, transferred to iPaaS Inc., a wholly owned subsidiary of Pareteum Corporation, 1185 Avenue of the Americas 2nd floor, New York, NY 10036, USA, during the time when you are using the app:

- Identifying device data (e.g., Android ID)
- Technical specifications of the smartphone
- Technology used (2G, 3G, 4G, Wi-Fi)
- Geolocation of the smartphone
- Data rate measured in both download and upload
- Package runtime measured
- Number of hops between measuring client and measuring server
- Date/time
- Spatial sector allocation cell ID and cell LAN
- RSSI, RSRP, and RSRQ signal strength
- Transferred data volume measured
- User name and password for authentication to the HotSpot

Authorizations

For the app to work on your device, it needs access to various functions and data on the device. You need to grant certain authorizations to do so (Art. 6 (1) a GDPR).

The authorizations are programmed differently by the various manufacturers. Individual authorizations may e.g. be combined in authorization categories, and you can only grant consent to the authorization category as a whole.

Please remember that if you withhold consent for one or a number of authorizations, you may not have access to the full range of functions offered by our app.

If you have granted authorizations, we will only use them to the extent described below:

Location data

The app requires information on your current location for the following purpose: Localizing the user in order to use the best HotSpot in the area

Internet communication

The app requires access to the Internet via Wi-Fi or mobile data network for the following purpose:

- Establishing Wi-Fi access through authentication
- Downloading profile data
- Uploading data on quality

Does the app send push notifications?

Push notifications are messages that the app sends to your device and that are displayed with top priority. This app uses push notifications by default, provided you have given your consent during the app installation or the first time you use the app (Art. 6 (1) a GDPR).

You can deactivate receipt of push notifications at any time in your device settings.

Where can I find the information that is important to me?

This **data privacy information** provides an overview of the items which apply to Deutsche Telekom processing your data in this app.

Further information, including information on data protection for specific products, is available at <https://www.telekom.com/en/corporate-responsibility/data-protection-data-security/data-protection> and <https://www.telekom.com/en/deutsche-telekom/privacy-policy-1744>.

Who is responsible for data processing? Who should I contact if I have any queries regarding data privacy at Deutsche Telekom?

Deutsche Telekom AG is the party responsible for data privacy ("controller"). If you have any queries, please contact our [Customer Services](#) department or the Group Data Privacy Officer, Dr. Claus D. Ulmer, Friedrich-Ebert-Allee 140, 53113 Bonn, Germany datenschutz@telekom.de.

What rights do I have?

You have the right

- a) To request **information** on the categories of personal data concerned, the purpose of the processing, any recipients of the data, the envisaged storage period (Art. 15 GDPR);
- b) To request incorrect or incomplete data is **rectified** or supplemented (Art. 16 GDPR);
- c) To **withdraw** consent at any time with effect for the future (Art. 7 (3) GDPR);
- d) To **object** to the processing of data on the grounds of legitimate interests, for reasons relating to your particular situation (Art 21 (1) GDPR);
- e) To request the **erasure** of data in certain cases under Art. 17 GDPR – especially if the data is no longer necessary in relation to the purposes for which it was collected or is unlawfully processed, or you withdraw your consent according to (c) above or objected according to (d) above;
- f) To demand under certain circumstances the **restriction** of data where erasure is not possible or the erasure obligation is disputed (Art. 18 GDPR);
- g) To **data portability**, i.e. you can receive your data which you provided to us, in a commonly used and machine-readable format, such as CSV and can, where necessary, transmit the data to others (Art. 20 GDPR);
- h) To **file a complaint** with the competent **supervisory authority** regarding data processing (for telecommunications contracts: the German Federal Commissioner for Data Protection and Freedom of Information (Bundesbeauftragter für den Datenschutz und die Informationsfreiheit); for any other matters: State Commissioner for Data Protection and Freedom of Information North Rhine-Westphalia (Landesbeauftragter für den Datenschutz und die Informationsfreiheit Nordrhein-Westfalen).

Who does Deutsche Telekom pass my data on to?

To **processors**, i.e. companies we engage to process data within the

legally defined scope, Art. 28 GDPR (service providers, agents). In this case, Deutsche Telekom also remains responsible for protecting your data. We engage companies particularly in the following areas: IT, sales, customer services, and printing.

To **cooperation partners** who, on their own responsibility, provide services for you or in conjunction with your Deutsche Telekom contract. This is the case if you contract with us services from these partners or if you consent to the incorporation of the partner or if we incorporate the partner on the basis of legal permission.

Owing to legal obligations: In certain cases, we are legally obliged to transfer certain data to the requesting state authority. Example: Upon presentation of a court order, we are obliged under § 101 of the German Copyright Act (Urheberrechtsgesetz – UrhG) to provide the owners of copyrights/ancillary copyrights with information about customers who have allegedly offered copyrighted works via Internet file sharing services. The roaming service for wireless hotspots of the Global Corporate Access App is mainly governed and provided by our cooperation partner iPass Inc, a wholly owned subsidiary of Pareteum Corporation, 1185 Avenue of the Americas 2nd floor, New York, NY 10036, USA.

Where is my data processed?

Your data will first be processed in Germany and other European countries. If your data will also be processed in countries outside the European Union (i.e. in third countries) by way of exception, this is done only if you have explicitly given your consent or it is required so we can provide you with services or it is provided for by law (Art. 49 GDPR).

Furthermore, your data will only be processed in third countries if certain measures ensure a suitable level of data protection (e.g., EU Commission's

This privacy information was last updated 15.04.2021