



# Data privacy information T-Mobile HotSpot GmbH („Telekom“) for Inflight App Lufthansa

T-Mobile HotSpot GmbH 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.

The app offers the option to create a user account. If you decide to register a user account, you can save a preferred payment method and/or voucher codes in the app. If you opt to use the app in guest mode, these functions will not be available. The remaining functions of the app, such as purchasing Wi-Fi packages before or during the flight, do not depend on the access method.

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

### a) When registering:

To register for the app, you will have to enter your name and e-mail address. This data is required for Contract performance (Art. 6 (1) b GDPR) and is stored on our servers until you delete your user account. The app can be used with a user account, the necessary information then will have to be put in manually for every single purchase.

#### Authentication

If you use a third-party identity provider to create a user account, the third-party identity provider will grant us access to your personal data. The data will only be transferred once you have given your explicit consent. You can always revoke your consent in the user account settings of your third-party identity provider account.

If you are using the credentials of your third-party identity provider account (Facebook, Google, Apple, Miles&More) to register in our app or to login, we will import personal data, to create the user account. We request the following information to create a user account:

- name
- E-Mail-Address

### b) When using the app:

When you use the app, our servers will temporarily record your device's IP address and other technical details, such as the requested content (Art. 6 (1) b GDPR).

Apart from inputting data using the keyboard you can also use this app to dictate text. Voice input (Google) or dictation function (Apple) is a functionality which our app's operating system provides. During use, a third party processes the speech (e.g., Apple or Google) as processor and delivers the result to our app, entering it into the input field. Contact your specific operating system vendor for details on the functionality, and how you can switch on/off usage.

When using the app, the following data will be processed and stored.

## 1. Personal Data collected when using the app in guest mode Personal Data (Wi-Fi Package Purchase)

Personal data based on your input:

- name
- E-Mail (mandatory for invoice and credentials)

We process this data to provide you access to the Internet via HotSpot and to be able to answer any inquiries you might have, e.g. regarding outages or cancellation requests.

Collection of Connection Data (Wi-Fi Package Purchase)

### a. For invoicing and reimbursement in case of usage, we collect the following data:

- Username (numerical)
- name
- Timestamp (start and stop)
- Product type

### b. During usage:

- Used data volume
- Used time
- Payment method
- Transaction ID
- HotSpot Location (airline, aircraft)

#### Storage Period per Flight

The detailed connection data is anonymized after 7 days and then deleted.

#### Payment Data (Wi-Fi Package Purchase)

Your payment data is recorded directly at the billing service providers and not stored by T-Mobile HotSpot GmbH. The billing data is stored exclusively for the purpose of maintaining an error-free infrastructure and for invoice-relevant questions and is deleted after 90 days.

We work with the companies listed below to process payments for HotSpot Pass based on the payment processes offered:

- Payment with Credit Card:
  - Payment Service Provider - Computop Wirtschaftsinformatik GmbH, Schwarzenbergstr. 4, D- 96050 Bamberg
  - Credit Card Acquirer - Elavon Financial Services Limited, Lyoner Str. 36, 60528 Frankfurt am Main
  - American Express Payment Services Limited, Theodor- Heuss-Allee 112, 60486 Frankfurt am Main
- Payment by PayPal
  - PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg
- Payment by Miles and More:

- Miles & More GmbH, MAC Main Airport Center, Unterschweinstiege 8, 60549 Frankfurt/Main
- **Payment by AliPay (Wirecard)**
  - Einsteinring 35, 85609 Aschheim, Germany

**Storage period for master data and payment data (voucher customers)**

When a bill is paid by voucher, all master and payment data is deleted after 90 days

**2. Personal Data collected when using the app as a registered user**

**Personal Data (Wi-Fi Package Purchase)**

Personal data based on your input:

- name
- E-Mail (mandatory for invoice and credentials)

We process this data to provide you access to the Internet via HotSpot and to be able to answer any inquiries you might have, eg. regarding outages or cancellation requests.

**Collection of Connection Data (Wi-Fi Package Purchase)**

**a. For invoicing and reimbursement in case of usage, we collect the following data:**

- Username (numerical)
- name
- Timestamp (start and stop)
- Product type

**b. During usage:**

- Used data volume
- Used time
- Payment method
- Transaction ID
- HotSpot location (Airline)

**Storage Period per Flight**

The detailed connection data is anonymized after 7 days and then deleted.

**Payment Data (Wi-Fi Package Purchase)**

You can store one preferred payment method (credit card, PayPal, MaM) in your user account. By storing a payment method, you enable the 1-click purchase feature in the app. The stored payment method is not stored in the app, it is pseudonymized and stored on the servers of Deutsche Telekom AG. The billing data is stored exclusively for the purpose of maintaining an error-free infrastructure and for invoice-relevant questions and is deleted after 90 days.

We work with the companies listed below to process payments for HotSpot Pass based on the payment processes offered:

- **Payment with Credit Card:**
  - Payment Service Provider - Computop Wirtschaftsinformatik GmbH, Schwarzenbergstr. 4, D-96050 Bamberg
  - Kreditkartenaquirer - Elavon Financial Services Limited, Lyoner Str. 36, 60528 Frankfurt am Main
  - American Express Payment Services Limited, Theodor-Heuss-Allee 112, 60486 Frankfurt am Main
- **Payment by AliPay (Wirecard)**
  - Einsteinring 35, 85609 Aschheim, Germany
- **Payment by PayPal**

- PayPal (Europe) S.à r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg

▪ **Payment by Miles and More**

- Miles & More GmbH, MAC Main Airport Center, Unterschweinstiege 8, 60549 Frankfurt/Main

**Storage period for master data and payment data (voucher customers)**

Your personal data is stored until you delete your user account. Your account will be automatically deleted after five years of inactivity. Your payment data will be deleted after 90 days.

If you decide to store a preferred payment method in your user account, this payment method will be pseudonymized and stored on the servers of Deutsche Telekom AG and linked to your user account.

The stored payment method will be deleted, when you delete the payment method in your user account or when you delete your user account. If you do not delete your payment method, it will be stored as long as it is valid.

**Deletion of your user account**

If you wish to delete your user account, but no longer have access to it, you can send an e-mail to [inflight@telekom.de](mailto:inflight@telekom.de) and request the account deletion. Please provide your name and e-mail address the account was registered with. The user account will be deleted promptly.

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

- **Connection Management.** The network name, which is mandatory for the connection management, is only provided by the operating system to the app once the location data has been shared
- There is no permanent storage

**Internet communication**

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

- Loading of the current products
- Executing payment procedures
- Storing discount codes (if logged in)
- Redemption of discount codes
- Querying user account information (if logged in)
- There is no permanent storage

## 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.

The data is processed by the contract data processor MoEngage.

## Will my usage habits be evaluated, e.g. for advertising purposes or tracking?

### Explanations and definitions:

We want you to enjoy using our app and take advantage of our products and services. We have an economic interest in ensuring this is the case. We analyze your usage habits on the basis of anonymized or pseudonymized data so you can find the products that interest you and so we can make our app user-friendly. We or companies commissioned by us to process data create usage profiles to the extent permitted by law. This information cannot be traced back to you directly. The following information is intended to provide you with general information on the various purposes of processing data. You can change your data privacy settings to consent to the use of the tool, or reject their use accordingly. Tools that are strictly necessary to provide the app's cannot be rejected (see explanation at 1. above).

### Tag management (strictly necessary)

Tag management is used to manage tracking tools in apps. A tag is set for each page to do this. Based on the tag, the system can determine which tracking tools should be used for this page. Tag management can be used to specifically control tracking so that the tools are only used where appropriate.

### Market research / Reach measurement (opt-in)

Reach measurement aims to statistically determine an app's use intensity and the number of users as well as obtaining comparable figures for all the connected services. Individual users are not identified at any time. Your identity is always protected.

### Improvement of the app's technical quality (opt-in)

To measure the quality of the app programming or to register crashes and causes, the program sequence and usage habits are analyzed. Individual users are not identified.

### Tools with optional usage

These tools are activated when you use additional functions, e.g. the chat. The possible functions are explained in section 1 of this data privacy information. The legal basis for these tools is Art. 6 (1) a GDPR respectively for third Countries Art. 49 (1) a GDPR (**s. Annex**)

### Analysis tools

These tools help us to improve our understanding of how our apps are used.

Analysis tools allow for the collection of usage and identification data by the original provider or third party providers and their compilation into pseudonymous usage profiles. We use analysis tools, e.g., to determine the number of individual users of an app, to collect technical data if the app has crashed, and to analyze the app's usage patterns and user interactions on the basis of anonymous and pseudonymous information. This information cannot be traced back to a person. The legal basis for these tools is Art. 6 (1) a GDPR. (**s. Annex**).

### Services by other companies (independent third party providers)

Some pages of our app pages feature services of third party providers, who bear the sole responsibility for their services. This involves the use of tools to capture data while the app is used and transmission of the

data to the respective third party provider. Some of the data may be transmitted for Deutsche Telekom's own purposes. The legal basis for these tools is Art. 6 (1) a GDPR. The scope, purpose and legal basis on which further processing is carried out for the third party's own purposes can be found in the third party's data privacy information. Information about these independent third party providers can be found in the following.

### Lufthansa

On one page we are linking out to the Lufthansa FlyNet® portal. Lufthansa FlyNet® is hosted by Deutsche Lufthansa AG, Venloer Straße 151-153, 50672 Köln, Deutschland. When visiting the portal, a cookie will be placed in your browser. For more information, please visit <https://www.lufthansa.com/de/en/information-on-data-protection>. During the flight, you can find the necessary information under: [ww2.lufthansa-flynet.com](http://ww2.lufthansa-flynet.com).

## 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 privacy information 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?

T-Mobile HotSpot GmbH acts as the data 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](mailto:datenschutz@telekom.de).

## What rights do I have?

You have the right,

- a) To request **information** on the categories of personal data concerned, the purposes of the processing, any recipients of the data, and the envisaged storage period (Art. 15 GDPR);
- b) To request that incorrect or incomplete data be **rectified** or supplemented (Article 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 (Article 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 object 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 the data that you provided to us in a commonly used and machine-readable format such as CSV, and can, where necessary, transfer 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, Article 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, marketing, finance, consulting, customer services, HR, logistics, 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 order services of these partners from us, if you consent to the involvement of the partner, or if we involve the partner on the basis of legal permission.

**Owing to legal obligations:** In certain cases, we are legally obliged to

transfer certain data to a state authority that requests it. Example: Upon presentation of a court order, we are obliged under Section 101 of the German Copyright Act (UrhG) to provide the owners of copyrights/ancillary copyrights with information about customers who have allegedly offered copyrighted works via Internet file sharing services.

### Where is my data processed?

Your data will be processed in Germany and other European countries.

If, in exceptional cases, your data is also processed in countries outside the European Union (i.e., in third countries), this is done only if you have explicitly given your consent, if it is required so we can provide you with services, or if it is prescribed by law (Article 49 GDPR). Furthermore, your data is processed in third party countries only if certain measures ensure a suitable level of data protection (e.g., EU Commission's adequacy decision or suitable guarantees, Art. 44 et seq. GDPR).

This data privacy information was last updated 01.03.2021

**Annex:**

Will my usage habits be evaluated, e.g. for advertising purposes or tracking?

**Tools with optional usage**

Company	Purpose	Storage period	Country of processing
<a href="#">MoEngage</a>	Push messages	24 months	India

**Analysis tools**

Company	Purpose	Storage period	Country of processing
vmware (formerly Aptelligent)	Technical app quality	30 days	USA
<a href="#">Adjust</a>	Customized design	28 days	Germany