

## **TADAAM PRIVACY POLICY**

Welcome, dear visitor, customer, user of TADAAM products and services, interested reader: you find your privacy important and are interested in our privacy policy. At TADAAM, we also attach great importance to your privacy and do everything we can to deal with it in a caring and responsible manner. We also want to communicate clearly about this, which is why we have bundled all relevant information regarding the collection and use of your data (we call it 'personal data') in this privacy policy.

The collection and use of your personal data by TADAAM is done in accordance with the applicable laws and regulations. This concerns in particular the General Data Protection Regulation (GDPR), and other applicable legislation such as the Electronic Communications Act. In the legislation, the collection and use of your data is called 'processing of personal data'.

Good to know:

- The processing of Cookies is always done in accordance with our privacy policy. For more information about cookies and how you can manage your cookie preferences, we refer you to our Cookie Policy.

## WHAT IS COVERED IN THE PRIVACY POLICY?

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## 1. WHO ARE WE?

TADAAM is a brand of Telenet BV (with registered office at Liersesteenweg 4, 2800 Mechelen, and registered with the KBO under number 0473.416.418, hereinafter referred to as 'Telenet'). Telenet is a telecommunications company that, together with the brands BASE and TADAAM, belongs to the larger Telenet group ('Telenet Group Holding SA/NV'). Telenet Group Holding nv is a 100% subsidiary of Liberty Global.

Telenet is responsible for the collection and use of your personal data when using the TADAAM products and services and watches over this as a good father would. Telenet determines which data it collects and uses, how it does this and why, always in line with the applicable laws and regulations. Telenet is the data controller. TADAAM uses its own systems in which your personal data is stored and processed, which are completely separate from the Telenet systems. The products and services offered by TADAAM also differ significantly from those offered by Telenet.

TADAAM therefore has its own privacy policy that is better aligned with its activity. Telenet's privacy policy therefore does not apply to the processing of personal data by TADAAM.

## 2. WHO IS PROTECTED BY THIS PRIVACY POLICY?

Everyone who uses TADAAM products and services is protected by this privacy policy. By 'everyone' we mean natural persons (not companies or offices) of whom we know who they are (you are identifiable, an individual).

We are thinking of

- *Our customers;*
- *Our ex-customers;*
- *Potential future customers (prospects);*
- *The contact persons and other employees of our suppliers and partners;*
- *The contact persons of our customers if applicable (e.g. guardian);*
- *Visitors to our websites;*
- *Users of our mobile applications (apps);*
- *Participants in competitions, promotions, surveys, events, ...*

It may happen that you, as a TADAAM customer, allow family members, friends, visitors and employees to use TADAAM products and services. An example is giving them access to your wifi. This means that TADAAM processes their personal data and that they are therefore also subject to the TADAAM privacy policy. However, TADAAM has no relationship with them and can therefore not inform them of this. We count on you as a customer to take your responsibility and inform them of this.

### 3. WHAT PERSONAL DATA DOES TADAAM PROCESS AND WHY?

TADAAM processes various categories of personal data in order to carry out its activities. In this chapter, we want to give you insight into the categories of personal data that we collect, how we obtain them and for what purposes we process them.

Depending on which TADAAM products and services you use, we collect and use different types of personal data. Below we describe which personal data these are, how we obtain them and why we collect and use them (we call these the processing purposes). You can read more about the retention periods of these personal data in chapter 6 of this privacy policy.

#### a. Which personal data do we process?

The personal data that we process can be divided into four types, namely user data, transaction data, derived data and sensitive data:

<p><b><i>User data</i></b></p> <p><i>This is data that is directly linked to you, regardless of your products or services.</i></p>	<ul style="list-style-type: none"> <li>• <b>Identification data:</b> personal data that can identify you as a user of our products and services, such as your name and address, your date of birth, your nationality, your ID card number and image, your national register number (via the ‘Itsme’ app);</li> <li>• <b>Contact data:</b> personal data that allow us to contact you, such as your telephone number, your e-mail address, etc.;</li> <li>• <b>Contract data:</b> personal data related to your contract, such as the products you have with us, your customer number, billing and payment data, contract and order confirmation, technical data such as personal data linked to your devices, such as the model and number of your TV box, your IMEI number of your telephone, etc.;</li> <li>• <b>Financial data:</b> bank account number, payment method and creditworthiness assessment;</li> <li>• <b>Communication data:</b> data relating to our communication with you, such as the interactions you have had with our customer service (via e-mail or live chat).</li> </ul>
<p><b><i>Transaction data</i></b></p> <p><i>This is data linked to your use of TADAAM services and data created by your use of TADAAM services.</i></p>	<ul style="list-style-type: none"> <li>• <b>Technical data:</b> the MAC address of your laptop, the software version on your phone with which you use one of our apps...;</li> <li>• <b>Traffic data:</b> this is data that we need to be able to transmit your communication (to handle traffic over electronic communication networks). Technical data and consumption data may also fall under this if they relate to your communication;</li> <li>• <b>Location data:</b> personal data that make it possible to determine the geographical position of your devices, such as GPS determination, connection to which transmission tower or WiFi point;</li> </ul>

	<ul style="list-style-type: none"> <li>• <b>Consumption data:</b> personal data that our systems create when you use our services, such as: <ul style="list-style-type: none"> <li>○ <b>When surfing (both fixed and mobile internet):</b> the date, time, duration and location of an internet connection, the URLs that you visit, as well as the internet volume consumed and the type of protocol or service (e.g. FTP, HTTP, Streaming...);</li> <li>○ <b>When watching TV:</b> per TV box (decoder) we keep track of data such as which programs you watch, which films you watch, what you record, pause, fast-forward and rewind or watch in delay, what your favorite TV channels are or which apps on our TV box (decoder) you have recently used (both via the TV box and via our TV apps, both for live and near-live television viewing, catch-up TV and recorded programs);</li> <li>○ <b>When making a phone call:</b> we process data relating to the telephone numbers, the date, the time, the duration of a call, etc.;</li> </ul> </li> <li>• <b>Data relating to the content of your communication:</b> such as the message you send in an SMS, the content of the telephone conversation you have, the e-mail you send or receive, the video you watch on a website, etc. Of course, always with respect for telecommunications confidentiality;</li> <li>• <b>Behavioral data:</b> For example, data on how you navigate in the menu of our TV box (decoder). Data relating to your visit to our websites: we collect certain data via cookies when you visit our website, such as your IP address, which page you view, what you put in your shopping cart, etc. We also use cookies when you open our emails and when you use our apps (such as which software version you use, the time and duration of use of the app, your navigation through the app, etc.). For more information about cookies, please refer to the <a href="#">TADAAM Cookie Policy</a>.</li> </ul>
<p><b>Derivative data</b></p> <p><i>This is data that we derive from your user data and your transaction data.</i></p>	<p><b>Profiles:</b> Based on your user and transaction data, we are able to build a profile of you. For example, if you use a lot of mobile data, we can deduce that you are a heavy user of mobile data. If you like watching sports programs, we can deduce that you are a sports fan. We also assign a score to your WiFi based on how well or poorly it works. Do you have children? We can deduce that you are a family. The derivation 'high user', 'sports fan', 'WiFi score' or 'family' is called profiles.</p>

	<p>We distinguish between two types of profiles:</p> <ul style="list-style-type: none"> <li>• <b>Service type:</b> these are only used for service reasons such as analyses around network management, scheduling technicians, call center planning, input for customer care to be able to help you further with problems. Or if network measurements show that your modem is not functioning properly, your modem will receive a bad score.</li> <li>• <b>Commercial type:</b> these are used to deliver the right advertising to the right target audience. We also use these profiles in analyses with a commercial purpose, for example to investigate how much customers would be willing to pay for a new functionality or, for example, to investigate why our customers leave TADAAM.</li> </ul>
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b. How do we obtain this personal data?

This can be done in different ways:

- We receive the personal data directly from you, such as when you enter into a contract, when you contact our customer service, participate in a competition, fill out a survey or a contact form, download the TADAAM app, etc.
- We assign your personal data for the use of our products and services, such as a TV box (decoder) number, an IP address, an eSIM number, customer number, login code(s) and passwords.
- In addition, our systems register personal data that is generated during your use of our products and services, such as the television programs you have watched or the identification numbers of the devices linked to your TADAAM internet connection.
- Finally, we also obtain personal data via third parties. Some examples:
  - *We purchase personal data from specialized data companies to match with our own data (validate, supplement, correct, etc.) to improve the quality of the data in our systems;*
  - *We obtain data regarding your mobile usage abroad via other telecom operators;*
  - *We obtain personal data via affiliated companies within the Telenet group, e.g. in the context of a takeover;*
  - *We obtain data from social media channels such as Meta, Google, LinkedIn, etc. (e.g. when you use your social media profile to log in or when you contact us via this channel).*

c. Why do we process this personal data?

We process personal data for various purposes, whereby we only process the personal data that is necessary to achieve the purpose. Below we list the purposes. We also indicate what our legal basis is for collecting and using your personal data.

In general, we process your personal data when this is necessary:

- *in the context of the preparation, execution or termination of a contract;*
- *to comply with a legal obligation; and/or*
- *for the promotion of our legitimate interests, in which case we always strive for a balance between that interest and respecting your privacy.*

If the processing of your personal data is not necessary for one of these three reasons, we always ask your permission to process your personal data. As a customer, you can manage your permission via [gdpr@tadaam.be](mailto:gdpr@tadaam.be).

The table below provides an overview of all purposes and legal grounds for which we process your personal data.

<b>Goals</b>	<b>Description</b>	<b>Legal Basis</b>
<b>Sales</b> <b>Aftersales</b> <b>Customer support</b>	When you decide to become a customer of TADAAM, we will ask you for some personal data for the management of our contractual relationship, such as your name, address, telephone number, e-mail address. We check your identity via the ‘Itsme’ app, whereby your identification data that is on your eID card is processed by using the app. In addition, we also assign you data such as a customer number and login data. This personal data is also used for our customer administration and support (e.g. complaints management).	Contract execution
	TADAAM also uses the personal data we request when entering into a contract with a view to preventing and combating fraud. We also use this personal data to identify existing customers, because we need to be certain that we are in contact with the right person (e.g. to make a change to a subscription).	Legitimate interest
	As part of the fight against terrorism, we are required to perform identity checks and maintain certain identity data.	Legal obligation
<b>Product and Service</b> <b>Billing</b> <b>Dispute management</b>	We use your personal data to set up, maintain and support your products and services, such as establishing your connection and transmitting communication via our network and that of other operators, calculating your consumption for billing and handling fault reports or complaints.	Contract execution

	<p>We can send you communication for service reasons, e.g. to inform you that your data limit has been reached, to ask you to reset your password or to send you documents about your billing.</p>	
	<p>In order to establish an optimal WiFi connection and to provide support in the event of problems with your WiFi network, we collect information via your modem about all connections to your WiFi network and neighbouring WiFi networks that could potentially cause interference.</p>	Legitimate interest
<b><i>Network Management</i></b>	<p>By analyzing network usage, we get essential information about the usage and load of our network. This enables us to perform good network management (routing traffic, resolving disruptions, monitoring peak and overload, ...) and to improve our networks where necessary.</p>	Contract execution
<b><i>Quality improvement</i></b>	<p>We may use your personal data to evaluate and improve our products and services. For example, we may check what type of hardware you have to optimize the use of our apps or to check the quality of your internet connection.</p> <p>We also try to improve our products and services based on customer feedback about our services (for example through market research), data that we obtain during our maintenance with or intervention at customers.</p>	Legitimate interest
	<p>If we cannot find the cause of a persistent fault on a line, we may – after obtaining your permission – temporarily record conversations for analysis.</p>	Permission
<b><i>Commercial use (marketing and direct marketing) for products of TADAAM and affiliated companies of Telenet</i></b>	<p>Direct Marketing is sending advertising and performing analyses with a commercial purpose. We can use your personal data to offer you new products, services or special promotions that we think are interesting for you. For example, you can receive an e-mail with a promotion for a TADAAM product that you do not yet have. We can send this advertising via various channels (by post, e-mail, SMS or telephone). We kunnen je eveneens nieuwsbrieven en uitnodigingen voor events, webinars, wedstrijden...</p>	Legitimate interest



	<p>It is also possible that we will contact you if you are no longer a customer of TADAAM.</p> <p>We may approach you with an offer as a future customer of TADAAM, for example if you gave your permission for this when registering for a competition.</p>	Permission
<b><i>Fraud Managment</i></b>	<p>When you become a TADAAM customer, we will ask you to provide us with your identity via the 'Itsme' app so that we can determine who you are and to prevent identity theft.</p> <p>Depending on the TADAAM products and/or services you choose, we will also check your creditworthiness.</p>	Legitimate interest
	<p>In order to protect our customers from fraud (e.g. via smishing), traffic on our network is automatically monitored to identify and stop fraudulent SMS messages where necessary. This means that you may not receive certain messages intended for you because they have been identified by our algorithms as a smishing attack. This monitoring may include an automatic screening of the content of the messages. This screening of the content is strictly limited to what is absolutely necessary to effectively combat fraudulent activity.</p>	Legitimate interest
<b><i>Security</i></b>	<p>In the context of network and information security, your personal data may be processed. Offering a secure network and communication service is an essential part of our service provision.</p>	Contract execution
<b><i>Support for government applications and legal obligations</i></b>	<p>In many cases, we are legally obliged to store and/or share certain personal data with government agencies.</p> <p>For example, we must pass on your location to the emergency services when you call 112.</p> <p>We may also be obliged to share certain personal data confidentially with the competent authorities in the context of a police or judicial investigation. Wij werken ook mee aan het tegengaan van kwaadwillige oproepen op vraag van de Ombudsdienst voor Telecommunicatie.</p>	Legal Obligations
<b><i>Anonymized reporting</i></b>	<p>We use your data to, for example, report internally and externally on the use of our services. These reports are anonymised and</p>	Legitimate interest

	<p>cannot therefore be traced back to a specific individual.</p> <p>For internal reporting purposes, we generate anonymous reports to analyse and gain statistical insights. For example, reports are generated on the use of our services, on the TV viewing behaviour of our customers, on the traffic on our network in the context of network management, on the use of our applications, on the load on our customer service, etc.</p> <p>Viewing statistics are drawn up based on your viewing behaviour. These reports contain anonymous figures regarding the number of viewers per broadcast and are shared with TV channels, who use these insights to evaluate the broadcast programmes.</p> <p>In addition to the statistics, we also pass on pseudonymised viewing data to TV channels (only for their own TV channels). The TV channels analyse this information to gain insight into how viewers watch their programmes (e.g. watch live, record and watch later, watch on hold, rewatch, etc.) and use this information to optimise their programming. The personal data we pass on is pseudonymised by removing data that could identify an individual, with the exception of the customer number that is scrambled (using tokenisation). You cannot be identified on the basis of the personal data that is passed on.</p> <p>Finally, we use your location data (connection of your eSIM to the antenna mast) to create anonymous location reports ('how many people were at a certain place at a certain time?') for event organisations, supermarkets, cities/municipalities, etc. Here too, these reports are completely anonymous.</p>	
<p><b><i>Publication in telephone directories and telephone directory enquiry services</i></b></p>	<p>Your contact details are not published in telephone directories or telephone information services by default, this is only possible with your permission. For this publication, we are legally obliged to have your contact details passed on via the <a href="#">Central Number Database</a>, which then makes them</p>	<p>Permission</p>

	<p>available to telephone directories and information services.</p> <p>You can read more information about this publication via <a href="#">this link</a>.</p>	
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**Just this:**

- **The content of your personal communication is confidential.** We process your data to make the communication technically possible, but the content of your personal communications that pass through our network (for example mobile phone calls, e-mails and text messages) are protected by the provisions of telecommunications secrecy. Telecommunications secrecy means that TADAAM may not have knowledge of the existence or content of such communication, except for the exceptions listed by law. TADAAM has taken the necessary security measures and given adequate instructions to its employees to respect telecommunications secrecy.

One of those exceptions is the automatic screening of the content of text messages to combat smishing and other forms of SMS and MMS fraud. This screening is done using algorithms that help us detect and block fraudulent messages. This means that end users may not receive certain messages that were intended for them because they have been identified as smishing attacks. Screening of the content of the communication is limited to what is absolutely necessary to efficiently combat fraudulent activities via SMS or MMS communication as permitted by the Belgian law on electronic communications (art. 125, §1, 7°). This means that not all communication will be analysed for content.

- Automatic decision-making TADAAM does not make any automatic decision-making – whether or not based on profiling – that has legal consequences for you or where such a decision significantly affects you, unless:
  - *this is necessary for entering into or executing your agreement (for example, creditworthiness check or concluding your TADAAM products and services in the event of non-payment);*
  - *this is permitted by law, or*
  - *we have obtained your express consent for this. In such situations, you will be informed in advance about the creation of the automated decision, about your right to demand human intervention and the way in which you can challenge the decision.*

#### 4. HOW DO WE PROTECT YOUR PERSONAL DATA?

The protection of your personal data is a priority for TADAAM. To this end, we have implemented appropriate technical and organizational security measures to provide maximum protection for the personal data in our systems and databases against unauthorized access and/or use, loss or theft. These measures are tested, evaluated and adjusted where necessary on a regular basis to ensure an adequate level of security at all times.

Our information security policy is fully based on the international ISO27002 standard and contains guidelines relating to, among other things, access control, data encryption, security of operations, security of communications, physical security, etc. A specialized security team is responsible for the implementation and follow-up of the guidelines so that the security of our databases, networks, infrastructure and information systems is guaranteed.

Development or implementation of new systems, applications or development of new products is designed with the highest level of security in mind and always taking your privacy into account (the 'privacy by design' principle). Our security and privacy experts work closely with the development teams to ensure that there is appropriate protection, tailored to the assessed risk associated with the processing of the personal data in question. Access control is an important aspect of our information security policy. TADAAM has implemented procedures to limit access to our databases, systems, equipment and networks to persons who strictly need this access to perform their duties. These persons must observe a strict duty of confidentiality and comply with all guidelines for ensuring the protection of personal data.

TADAAM also provides privacy and security-specific training for its employees to clarify the guidelines and procedures to its employees and to make them aware of the risks associated with the processing of personal data.

TADAAM also sets high security requirements for its partners and suppliers who process your personal data on our behalf. Partly through contractual guarantees, we ensure that they, like us, process your data securely and with respect for privacy legislation. We therefore expect our partners and suppliers to implement an information security policy and security measures that are based on international standards and best practices.

## 5. DO WE PASS ON YOUR PERSONAL DATA? AND TO WHOM?

In order to be able to offer you our services, we in certain cases call on third parties who are given access to your personal data. A transfer to third parties only takes place within the framework of the purposes as described in title 3.c. Below we list to whom we pass on personal data.

### **Transfer of personal data to third parties who work on our behalf**

We make some of our databases accessible to third parties who work on our behalf and who assist us in delivering our products and services. Some examples:

- *Companies and independent technicians who maintain our network;*
- *Logistics companies that deliver our devices to you;*
- *The payment platform we use to set up and settle the monthly payment;*

- *Management of our external legal archive (for example invoices), both digitally and on paper;*
- *Companies that handle our outgoing paper document flow (for example invoices);*
- *Collection agencies and legal service providers in the context of collecting our invoices;*
- *Cloud providers;*
- *Security firms (cybersecurity);*
- *Companies specialized in ICT to support our IT team;*
- *Companies specialized in telecommunications and network infrastructure;*
- *Companies affiliated with TADAAM (which belong to the Liberty Global or Telenet group if they manage technical platforms or software applications for us);*
- *Specialized big data companies (data brokers and data analysts) in the context of data enrichment and data analyses;*
- *Market research agencies;*
- *Marketing agencies that assist us with all kinds of advertising campaigns;*
- *Partners with whom we collaborate in the context of a specific campaign (for example with a travel agency, for a Telenet competition where you can win a city trip);*
- *Specialized cookie analytics companies (such as Google and Adobe);*
- *Specialized companies that support us in our fight against spam and other abuse via our websites (such as reCAPTCHA Enterprise, part of Google);*
- *Universities in the context of product development and innovation;*
- *Social media platforms such as Meta, Google, LinkedIn... in the context of direct marketing campaigns via these channels (they may not use this data for their own purposes, e.g. to enrich their own data).*

The transfer of your personal data is limited to the personal data they need to perform their task on our behalf. We ensure that they, just like us, manage your data safely, respectfully and as a good father of the family and we provide adequate contractual guarantees for this.

**□ Transfer of personal data in the context of a legal obligation**

The law obliges us to transfer certain personal data to a number of competent authorities. Some examples:

- *Emergency centres;*
- *Judicial authorities;*
- *Belgian intelligence services;*
- *Tax authorities;*
- *Central Number Database;*
- *Belgian Institute for Postal Services and Telecommunications (BIPT);*
- *Telecommunications Ombudsman.*

**□ Transfer of personal data to other companies within the Telenet Group**

We may transfer your personal data to affiliated companies within the Telenet group. Some examples:

- To inform you about the products and services of the entire Telenet group;
- In the event of non-payment, we may also transfer your payment habits to protect the legitimate interests of the Telenet group.

The companies within the Telenet group qualify in this context as separate data controllers, and the agreements regarding data processing are contractually laid down between the respective companies.

**□ Transfer of personal data to third parties in the context of a takeover or merger**

We may transfer your personal data to third parties in the context of a takeover or merger transaction. This also applies to the preparatory phase of the transaction. Here too, the agreements regarding data processing are contractually laid down in a data processing agreement between the respective companies.

**□ Transfer of personal data to third parties who do not work on our behalf**

In certain cases, we may also transfer your personal data to other parties who themselves determine what their purposes are for processing your data. These third parties therefore act as controllers (or co-controllers) for the processing of the data and their own privacy policy also applies.

This transfer is only possible if you have given permission for this, if the transfer is necessary to fulfil the obligations of our agreement or to meet the legitimate interests of TADAAM or a third party.

The transfer is limited to only those personal data that are necessary and relevant for the intended processing.

Some examples of transfer after consent:

- *Transfer of your contact details (name, address, telephone number) to providers of telephone directories and information services via the [Central Number Database](#).*
- *Transfer of the number of your decoder (digibox), IP address and your profiles to [Ads&Data](#), which will build an advertising profile based on this data and other collected data (e.g. sports enthusiast, male, age category, etc.) in order to automatically select personalized advertisements that will be shown to you on certain websites and applications. Ads&Data will not transfer your data to advertisers or other partners, but uses a secure intermediate platform in which data is uploaded encrypted and therefore not readable by another party. Ads&Data and Telenet act as joint controllers.*
- *It is also possible that TADAAM allows third parties to place cookies on our websites for their own marketing purposes or that TADAAM transfers the collected cookie data to third parties. This is only possible if you have given explicit permission for this via the cookie banner. You can read more about this in the [TADAAM Cookie Policy](#).*

Consent is given via the choices you have made in your privacy settings or specifically for the intended data processing after we have informed you about this.

Some examples of transfer in the context of contract execution:

- *In order to enable network interconnection (connection to electronic communication networks of other operators) and roaming, as well as all relevant administration (billing and settlement between operators), we will transfer your personal data to other telecom operators.*
- *If you open streaming services such as Netflix, VRT Max, Disney+ on the TADAAM TV box, we will transfer some technical data to these streaming services such as your IP address and operating system. This transfer is necessary in order to be able to interact with their application.*

#### □ **International data transfers**

Your personal data is also processed outside the European Union (the European Economic Area, also called the EEA). It is a given that many large IT suppliers, infrastructure suppliers and technology companies are not established in the European Union.

Some examples:

- *Maintenance of IT systems 24/7 - India, China, United States;*
- *Network infrastructure - China;*
- *IT security - India, United States;*
- *Cloud providers - United States;*
- *Interconnect and Roaming - worldwide;*
- *Software applications - United States.*

When transferring your personal data outside the EEA, we always respect the requirements of privacy legislation with regard to international transfers:

- We may transfer personal data to countries that the European Commission has determined provide an adequate level of data protection in accordance with European privacy legislation (GDPR), and
- We may transfer personal data based on the relevant modules of the European Commission's standard contractual clauses.

In addition, we have aligned ourselves with the guidelines regarding international data transfers issued by the European Data Protection Board. For each international transfer, we carry out a Data Transfer Impact Assessment to assess the legislation of the third country and to determine whether there are practices that are incompatible with the obligations of the transfer mechanism. This analysis also allows us to identify additional security, contractual and organizational measures to protect the data from unauthorized access by the public authorities of the third country.

## 6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We may not keep personal data for longer than is necessary to achieve the purpose for which we collect it. The retention period may therefore vary depending on the purpose. Some examples:

- *Traffic data relating to communications and connections are never kept for longer than 13 months;*
- *TV viewing behavior is kept for a maximum of 36 months;*

- *Billing data is kept for a maximum of 7 years;*
- *Your contract and order confirmations will be kept for a maximum of 10 years after you have left TADAAM as a customer.*

After the applicable retention period(s) have expired, personal data will be automatically deleted or anonymized.

If you leave TADAAM as a customer, we can contact you again up to 2 years after you have left to inform you about a new offer.

## 7. WHAT RIGHTS DO I HAVE AND HOW DO I EXERCISE THEM?

To give you more control over your personal data, you can easily manage it by submitting a request to exercise your privacy rights.

### a. Overview of your privacy rights

#### **Your right of access**

You have the right to find out from us whether or not we process your personal data, and if we do process them, to view those personal data and to receive additional information about elements such as the processing purposes, the categories of personal data involved, etc. You also have the right to receive one free copy of the processed personal data, in an understandable form. If you request additional copies, we may charge a reasonable fee for this, which covers the administrative costs of providing these copies.

#### **Your right to rectify**

You have the right to have incomplete, incorrect, inappropriate or outdated personal data corrected.

In order to keep your data up to date, we request that you notify us of any changes, such as a move or a change of email address.

#### **Your right to erasure**

You have the right to have your personal data erased if:

- *your personal data is no longer necessary for the purposes for which it was collected or otherwise processed by us;*
- *you withdraw your previous consent for the processing and there is no other legal basis on which TADAAM can rely for the (further) processing;*
- *you object to the processing of your personal data and there are no more compelling, justified grounds for the (further) processing by us;*
- *your personal data is processed unlawfully;*
- *your personal data must be erased to comply with a legal obligation;*
- *your personal data was collected when you were still a minor.*

Please note that we cannot always erase all requested personal data, for example when processing is necessary to provide your service, to exercise a legal claim or because the data is necessary to comply with a legal obligation or to fulfil a task in the public interest.

#### **Your right to restrict processing**



In certain cases, you have the right to obtain a restriction of the processing of your personal data. That is the case, among other things, when you dispute the accuracy of a personal data or when your personal data is no longer necessary to achieve the purposes of the processing, but you need it to institute, exercise or substantiate a legal claim.

□ **Your right to transferability of personal data/forwarding of data**

You have the right to ‘recover’ your personal data, for example to be able to change service providers more easily. This is only possible for the personal data that you have provided to TADAAM yourself, based on consent or following the conclusion of an agreement with us.

□ **Your right to object to the processing of your personal data**

You have the right to object when TADAAM uses your personal data for purposes other than those necessary for the performance of an agreement or necessary for compliance with a legal obligation. You must then submit a motivated request (containing the specific reasons why you wish to object to processing) and TADAAM will stop using your personal data in the event of a justified request, unless we have compelling reasons not to do so.

A motivated request is not required when it concerns processing in the context of Direct Marketing activities (including profiling). You always have the right to object to the use of your personal data for Direct Marketing purposes, without having to give a reason.

Furthermore, everyone (including former customers and prospects) can use these unsubscribe options:

- *if you do not wish to receive commercial calls, you can register on the so-called do-not-call-me-anymore list via their website ([www.dncm.be](http://www.dncm.be)) or by telephone on 02/882.19.75.*
- *if you no longer wish to receive commercial letters, you can register on the so-called Robinson list ([www.robinsonlist.be](http://www.robinsonlist.be)).*
- *if you no longer wish to receive commercial text messages, you can respond with “STOP” to the number that sent you the text message.*
- *if you no longer wish to receive commercial e-mails, you can use the unsubscribe option in the e-mail in question.*

**Please note:** the fact that you no longer wish to receive commercial communications from us does not, of course, affect our right to contact you in the context of the execution of your contract or if the law obliges us to do so.

b. How can I exercise my rights?

To exercise your privacy rights, you must inform us of this by e-mail to [gdpr@tadaam.be](mailto:gdpr@tadaam.be). In order to ensure that the request is made by the right person, we must verify your identity. In case of doubt or ambiguity, we will first ask you for additional information (preferably a copy of the front of your identity card). If we cannot identify you with certainty, we will not comply with your request.

**Please note:** due to the complexity, a different application procedure applies to the exercise of the privacy rights below. This concerns:

- *Right to restriction of processing*

- *Right to object to the processing of your personal data when it does not concern Direct Marketing*

If you wish to exercise these rights, you can submit your request to the Data Protection Officer (or 'DPO') via [this form](#) and clearly state privacy in the title. We will also ask you to identify yourself via this method.

**Are there any costs involved?** You can exercise your privacy rights free of charge, unless your request is manifestly unfounded or excessive, in particular because of its repetitive nature. In such a case, we have – in accordance with privacy legislation – the right and the choice to (i) charge you a reasonable fee (taking into account the administrative costs of providing the requested information or communication and the costs associated with taking the requested measures), or (ii) refuse to comply with your request.

**In what format will I receive a response?** If you submit your request electronically, the information will be provided electronically if possible, unless you request otherwise. In any case, we will provide you with a concise, transparent, comprehensible and easily accessible answer.

**When will I receive an answer?** We will respond to your request as soon as possible, 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 by two months if necessary. In the event of an extension of the period, we will inform you of this within one month of receipt of the request.

**What if TADAAM does not comply with my request?** In our answer, we will always inform you of the possibility of filing a complaint with a supervisory authority holding authority.

## 8. HOW CAN I CONTACT TADAAM IN CONNECTION WITH MY PRIVACY?

**I want to report a privacy breach to the Data Protection Officer.**

Report a privacy breach via [this form](#).

**I have another question about the processing of my personal data.**

If you have a question about the processing of your personal data and you cannot find the answer in this privacy policy, please contact us via this form.

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

Telenet BV  
Liersesteeweg 4  
2800 Mechelen

## 9. STAY INFORMED OF ADJUSTMENTS

TADAAM may change this privacy policy from time to time, for example in response to market developments and new processing activities. We therefore invite you to always consult the latest version of this policy on our website via [this link](#). Of course, we will inform you in advance via our websites or other current communication channels of any significant changes and, when required by law, we will ask for your prior consent for our (new) processing activities.

In the event of a conflict, our general terms and conditions and the special terms and conditions applicable to specific TADAAM products and services will prevail over this privacy policy.

#### 10. ESCALATION TO THE SUPERVISORY AUTHORITY

The Data Protection Authority is an independent body that ensures that your personal data is processed in accordance with the law. If you have a complaint in connection with the processing of your personal data by TADAAM or if you wish to initiate a procedure for mediation, you can contact the Data Protection Authority via this [link](#).

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