

Telenor Norway AS — General data processing terms for business customers

Telenor processes personal data in line with applicable laws and regulations and according to decisions made by relevant public authorities.

Telenor's and Customer's roles under the Personal Data Act

Telenor is data controller for services and processes in which Telenor processes personal data about the customer and the customer's users, for which Telenor determines the purpose of the processing as well as which methods, tools and/or security mechanisms will be used. This always applies when Telenor provides electronic telecommunication services, such as fixed-line and mobile telephony and internet access.

For services and/or processes in which Telenor processes personal data on behalf of the customer for specific purposes defined by the customer, Telenor is the data processor and the customer is the data controller. This applies when Telenor provides information society services over the internet, such as *Min Bedrift* or third-party cloud services, but also for services/processes that are a combination of electronic telecommunications services and information society services such as *Mobilt Bedriftsnett* and *Fakturakontroll*.

Also note that upon entering into an agreement between the customer and Telenor regarding the provision of user subscriptions, the customer will serve as controller for the data that the customer has obtained about its users (name, date of birth and address) and that the customer transfers to Telenor in connection with the creation of subscriptions. For this transfer, the customer will be the controller and Telenor will be the data processor (see *data processing terms* below). The purpose of the transfer is to make the agreed services available to customer's users, including enabling the data processor to subsequently authenticate users so that the correct user is given access to the relevant service. The data received is used to create user identities that are connected to the customer, or to update these if the user is already present in Telenor's customer database. The process of creating/updating and verifying user identities in the customer database takes place entirely in Norway.

When Telenor is the data processor, such processing of personal data is further regulated by service specific terms (see *data processing terms* below). Telenor notes that in such cases, the customer is responsible for ensuring the lawful purpose and legal basis for the processing of personal data.

Telenor's responsibility as data processor under the Personal Data Act (data processing terms)

When Telenor (as data processor) processes personal data on behalf of the customer (as controller), the following conditions apply:

The data processor will only process personal data as specified in these terms and the associated service terms for the use of relevant services or processes. The personal data will only be processed for specified purposes and in specified geographic areas, as defined in the relevant service annex.

The data processor can also process personal data when this is required by EU or national regulations to which the data processor is subject. In such cases, the data processor will inform the controller of the legal requirements, to the extent to which this is possible, before processing begins.

The data processor will ensure that the data is accessible exclusively to individuals who are authorized to process personal data, and that these individuals are subject to confidentiality requirements.

The data processor will implement technical and organizational measures to ensure a sufficient level of security, adapted to the risk that the processing represents.

The data processor will inform the controller of any change that involves replacing or adding a subcontractor before this change is implemented so that the controller has the opportunity to raise objections against the change.

In cases where the data processor engages a subcontractor to perform specific processing activities on behalf of the controller, the same obligations set out in this agreement shall apply to the subcontractor. If a subcontractor does not comply with these obligations, the data processor will be fully liable to the controller for the subcontractor's compliance with its obligations.

With regard to the nature of the processing and the available data, the data processor will assist the controller with:

- Fulfilment of the controller's obligations to respond to enquiries related to the exercising of the data subject's (user's) rights under applicable law.
- Implementation of appropriate technical and organisational measures to ensure a sufficient level of security considering the risks involved, including assessment of the consequences for privacy, that may reasonably be required by the controller, and communicate with the national Data Protection Authority.

In the event of a breach of personal data security, the data processor will notify the controller in writing without undue delay.

The data processor will immediately delete or return all personal data, including all copies, after the agreement has ended, or if the controller requests this in writing.

In cases where the processing of personal data takes place either 1) outside the EU/EEA area, or 2) in countries other than those pre-approved by the European Commission, the processing must be done in accordance with the current EU Model Contracts for the transfer of Personal Data to third countries. The data processor is therefore authorized to enter into such EU Model Clause Agreement on the controller's behalf.

The data processor shall give the controller access to all information that is reasonably necessary to document compliance with this provision, as well as allowing and contributing to revision of these data processing terms carried out by the controller or by a third-party auditor acting on the controller's behalf. All costs related to such revision are to be covered by the controller.

Information about the specific processing is detailed in the relevant service annex.

Telenor's use of personal data in customer advisory and marketing

Telenor may use any format to communicate with contacts designated by the Customer, including electronic communication (SMS, MMS, email etc.), to inform and give advice about, as well as market, Telenor's product and service offerings.