

## KPN Privacy statement

# KPN Privacy Statement

May 2022:

KPN B.V. and its group companies (together referred to as 'KPN') offer a wide variety of services, including fixed telephony, mobile telephony, internet services and TV. Given the nature of our services, KPN is in possession of certain information about you.

We're doing everything within our power to connect everyone in the Netherlands to a sustainable future. And you can be confident that your data is safe with us. Accordingly, we are always searching for ways to improve our services and to tailor them as much as possible to your personal needs. To this end, we also rely on models based on Artificial Intelligence (AI).

To provide you with the best service possible, it is important that we know which of KPN's products and services you use, even if you don't purchase all your products and services from one KPN brand or division. That is why we link the information in our possession if you purchase one or more services from us, so that we are able to deal with your questions, reports (for example about a fault) and complaints quickly and efficiently.

KPN is happy to provide you with information personally and at times that you need it. This information consists of tips about products that you use, newsletters or interesting offers. We will send you, for example, an e-mail containing a personal offer when your subscription ends or when you can renew your subscription. Or you will receive an SMS message when your credit has been used up, with a reminder to top up, to avoid paying too much. There may be benefits available to you if you purchase several services or products from us. An example of this is KPN Husel. We will be happy to inform you about these benefits. This is another reason for us to process your data.

However, when we do process this data, we put your interests first! You have to get something out of it.

### Our promise:

- **KPN handles your data with care. You can rest assured that your data will be safe with KPN and that we comply with the law.**
- **We do not look at the content of your communications. We do not monitor any conversations, or look at the content of your SMS messages, e-mails or chats, or keep a record of what websites you visit.**
- **We do not sell your data to third parties.**
- **We will notify you about the use of your data and offer you a simple way in which you can view and alter your data and privacy choices.**
- **You decide what happens to your data. We respect the choices you have made with regard to your privacy.**

In this privacy statement we explain, step by step, how we deal with your personal data. We explain what part of your data we process and what influence you can have on this. This privacy statement is divided into various chapters. These are summarized below.

This privacy statement applies to all of your data that KPN processes for the products and services that KPN markets in the Netherlands. This statement applies to all customers who purchase, for example, fixed and mobile telephony, internet, or TV from KPN and to all users of the KPN websites.

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## 1 WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

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All entities that are part of the KPN group have adopted principally the same privacy policy. This means that you always know where you stand. For example, if you are purchasing a service from KPN B.V, or from an entity within the KPN Group, then the Controller that processes your data is KPN B.V., Wilhelminakade 123, Rotterdam.

## 2 SUMMARY OF THE KEY PROCESSING OPERATIONS

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We set out below a general overview of the key data processing operations. The goal of the summary is to present an instant, accurate impression of which of your data we process when you use our telephony, internet and television services. This summary also sets out the choices you can make yourself for each service.

If you would like more information about a particular subject, just click on the relevant check box to access the corresponding information. If you want to find out more about the choices open to you and how to notify us of your choice, Go to "[Right to Object](#)". If you want to know what data we have on you, go to "[Inspection](#)".

We also process data from you on [our websites](#), in our [shops](#) and in our [apps](#). This is not stated in this summary. For a complete picture, we recommend that you read the privacy statement in full. It will also explain to you how we [share your data within KPN](#) and what our policy is with regard to [sharing your data with third parties](#).

To be able to process personal data we need a legal basis for doing so. The legal bases we can rely on are as follows:

- Necessary for performing the contract, including, for example, for providing the service, or network planning, management and security
- Compliance with a statutory obligation, e.g. storing of invoices for a period of 7 years for the tax authorities
- Legitimate interest, including, for example, in improving services, providing information about the use of the service, trend analysis, and marketing and sales
- Approval, including, for example, for personalized marketing and sales

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For what purpose ►		Supplying the service	Network planning / administration / security	Complying with statutory obligations	To improve service, provide information about using the service, trend analysis	Marketing and sales process	Supply to third parties for marketing purposes
▼ What							
Phone calls	<u>Contact data</u> <u>Usage data (how much you have called)</u>	yes	yes	yes	yes, unless objection	yes, unless objection	no
	<u>Usage data</u> <u>(who you have called, where, and when)</u>	yes	yes	yes	only if approved	only if approved	no
	<u>Content of communications</u>	no	no	yes	no	no	no
Purchase of peripherals on credit	<u>Personal data, registered credit payments and arrears, and results of various tests</u>	yes	no	yes	only if approved	only if approved	no
Internet	<u>Contact data</u> <u>Usage data (number of MBs you have used)</u>	yes	yes	yes	yes, unless objection	yes, unless objection	no
	<u>Consumption data</u>	yes	yes	yes	only if approved	only if approved	no
	<u>Content of communications, what sites you have visited</u>	no	only if approved	yes	no	no	no
Television	<u>Contact data</u> <u>(Usage data, number of items purchased)</u>	yes	yes	yes	yes, unless objection	yes, unless objection	no
	<u>TV watched in real time</u>	yes, only to display program	yes, only to resolve faults	yes	no	no	no
	<u>Usage on demand, what items you have ordered</u>	yes	yes	yes	yes	only if approved	no
	<u>Recordings made, what recordings you have made</u>	yes	yes	yes	only if approved	only if approved	no
KPN websites	<u>Data concerning your visits to KPN sites</u>	yes	yes	n/a	Personal, within and outside the KPN website and app		no
	<u>Data that you provide yourself</u>	yes	yes	n/a	yes, unless objection	yes, unless objection	no
	<u>Link to your contact and usage data</u>		Personal, within and outside the KPN website and app	Personal, within and outside the KPN website and app	Personal, within and outside the KPN website and app		no

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### 3 MAKING CALLS WITH KPN

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#### 3.1 WHICH OF YOUR DATA DO WE PROCESS?

##### 3.1.1 At time of registration, if you contact us

If you take out a subscription with us for a fixed or mobile telephone connection, we process some of your data. We also do this if you register as a customer or participate in a promotion. The data we process includes your name, address, copy of your proof of identity or residence, bank account number, e-mail address, date of birth, what services you buy from us, type of subscription and phone number. It does not matter whether you contacted us by telephone, via our websites or in one of our shops.

If you contact us, your data is registered. For example, we will record a question you ask us by telephone, via our websites or social media. We do this to be able to answer your question and to take the necessary actions to provide you with the right solution. Your data will be similarly registered if you report a fault, file a complaint, or fail to pay an invoice.

We refer to this data as 'contact data'.

KPN may make sound recordings/transcripts of your conversation with us for the purposes of our staff training. KPN is also required to make these recordings/transcripts to record your wish to change or terminate the services we supply to you.

##### 3.1.2 Use of the service

If you use our telephony services, KPN will process technical data connected with this use and that is necessary to transport telephone traffic over our network. Examples are:

- the date, time and duration of a connection, your own telephone number and the telephone number of the party you call, technical identification data, your SIM card number (IMSI), your mobile device number (IMEI), and the number of signals that your telephone sends out;
- location data necessary to ensure that you can use our telephony services at all times and to transport your telephone traffic across our network. This location data indicates the transmission mast with which your mobile device or tablet is in communication.

So we do not process the content of the communication.

This technical data (except for location data) is included on your itemized invoice. We call all this technical data 'consumption data'.

On the non-itemized 'front page' of our invoices we specify for example the number of minutes of call time and number of SMS messages you have sent, and the total sum owed. This data we call 'usage data'.

#### 3.2 WHAT DO WE DO WITH YOUR DATA?

##### 3.2.1 Service

The first reason for KPN to process your data is to be able to supply you with our services. We need to process your data to deal with your requests, to set up connections, to expand connections, to send invoices or answer questions about these, or deal with fault reports, or complaints. Unless we process your data, we cannot supply you with our services.

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### 3.2.2 Carrying out a risk analysis and credit registration, and provide credit

If you apply for a new mobile telephone subscription or credit, KPN will carry out a risk analysis. For this, KPN will construct, in collaboration with other providers of public telecommunications services, a database of contracting parties. This database contains a list of contracting parties that have been disconnected (or whose contract has been terminated) because of non-payment. This database is used by KPN and the other providers to make the right choices regarding acceptance of applications for telecommunication services. Stichting Preventel is responsible for this database. You can find more information at <https://www.preventel.nl/>.

As soon as we receive a request for a new telephone subscription or a renewal, your data will also be forwarded to Experian, a company credit report supplier. This also happens if you send in a credit application. All data pertaining to your payment history will also be shared with Experian. Experian processes this data under its own responsibility for analyses of credit worthiness, fraud prevention, debt collection and data quality validation. Experian can use this data to make an accurate risk analysis. If, as a result of payment arrears, you have ever had a contract terminated, this information may have consequences for other contracts that involve financial and other obligations. This applies to mobile telephony subscriptions entered into after January 1, 2010 and to fixed line subscriptions entered into after May 1, 2016. If you would like to know more about this subject, click [here](#).

KPN Finance B.V. will provide you with non-revolving credit for a term of one or two years for the purchase of a mobile telephone. For this purpose KPN needs to process additional data.

KPN requests the following information directly from you or via controlling parties:

- a) Name and full address
- b) Date of birth
- c) Valid proof of identity (photo will be rendered unidentifiable and BSN [citizen service] number will be crossed out)
- d) Database of telecom payment default (via Preventel)
- e) Fraud detection system (to check if there is any history of non-payment/fraud, etc.)
- f) Bank account number (you have to make a one-off pin payment of €0.01, so we can check your financial situation)
- g) Register of insolvencies
- h) Credit rating (by Experian)

To comply with statutory obligations in the supply of credit, as from May 1, 2017 KPN will process this customer data.

**For credit under €250 the following data will be processed:**

Before entering into a contract, we will process a shielded copy of your proof of identity. We also ask you to transfer €0.01, which will give us additional certainty.

During the term of the contract KPN will undertake periodic checks for the purposes of guaranteeing integrity. If a customer appears on a sanctions list, KPN will terminate the contract and de Nederlandsche Bank (DNB) will be notified accordingly. In that case, the data which we forward to DNB is as follows:

- Personal data, place and date of birth
- The nature and amount of the sum payable on demand
- The action taken by KPN
- The number of the applicable sanctions regulation

**In the case of credit between €250 and €1,000, the following data of yours will also be processed:**

So that KPN can act responsibly in supplying credit, it makes use of:

- a. Data concerning the total of registered credit advances in the Central Credit Registration System of the Central Credit Registration Office BKR (CKI)
- b. Data concerning payment arrears in credit contracts in the CKI

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### c. The result of the Telecom Income and Expenses Test

BKR will inform KPN about the total amount of registered credit payments and limits you have. They also let us know whether any current payment arrears in credit contracts have been registered against your name. If KPN has supplied you with credit, this credit will be registered in the CKI. If you do not comply with your payment obligations, KPN will report this to BKR, pursuant to Article 12 section 1 (under a and b) of the BKR Regulations.

To carry out the Telecom Income and Expenses Test, KPN will ask you to provide the following information:

- Family composition
- Net monthly income
- Monthly household expenses

If you want to know more, read the Telecom Credit Code on <https://www.kpn.com/gespreidbetalen>.

### 3.2.3 Planning, management, our network security, spam filter/virus scan

KPN is responsible for the telecommunications network that carries the telephone traffic. We are responsible for maintaining, planning and improving the network and management, such as routing traffic, resolving faults and monitoring peak load and overload. The analysis of network use provides us with essential information concerning the use of and load on our network. This information enables us to expand and improve our network in a focused way. KPN processes your fixed and mobile data for this technical and statistical analysis. The results of the analysis will be reported in anonymized form within KPN so that the data is no longer traceable to individuals. We concern ourselves with the quality of the services, not with the content of your communications.

KPN is responsible for securing our network and your connection to this network, by applying advanced techniques (such as firewalls, spam filters and virus scanners) to protect against security breaches, viruses, spam and malware. Would you like to know how to secure your own connection? Click [here](#).

### Conforming with statutory requirements

In some circumstances KPN is required by law to provide your data to third parties. For example, we must provide your data to the competent authorities for any criminal investigation and – at your request – to other providers to block the numbers you have called on your invoice.

### 3.2.4 Improving services, informing you of opportunities to use the products and services you have purchased, trend analyses

KPN processes your personal and usage data to improve our services and to inform you about opportunities to use the products and services you have purchased from us, unless of course you have made an objection to this. Your consumption data is also used for this purpose, but only if you have given your consent.

KPN uses statistical analyses to research trends in the market. We use the information obtained from these analyses in order to evaluate our products and services, as well as our processes, and to update them in line with new developments. We do not use these research results for marketing and sales activities focused specifically on you. For these, we use your personal and usage data, unless you have made an objection. Your consumption data can also be used for this purpose, but only if you have given your consent.

### 3.2.5 Marketing and sales activities, supply to third parties

KPN processes your personal and usage data for marketing and sales activities (even for a period of two years following termination of the contract) and for the benefit of KPN's own services, unless you have notified us that you object to this. We may also process your consumption data for our marketing and sales activities, but only if you have given your consent.

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Your data is processed by KPN for the purposes of making offers and to inform you of the options for using the products or services you have purchased from us. If you are not yet a customer of KPN, we will be happy to inform you about the options offered by KPN. We will only do so if you have given your consent. We can share this information with you by letter, telephone or digitally (e.g. via SMS or e-mail), unless you have notified us that you object to being approached by letter, SMS, e-mail or telephone. You can indicate this separately. Read chapter 11.3 elsewhere in this privacy statement for more information.

KPN will not supply your data to third parties for marketing, sales, or similar commercial activities. Insofar as data is supplied to third parties for activities like this, this is not for sales purposes, and will only happen in an anonymized and aggregated form.

If you are a customer of ING, KPN will share information with ING about sim card replacements that KPN undertakes on your behalf, in order to protect both you and ING against fraud. In supplying this data to ING, KPN will have regard to your privacy by shielding as much privacy-sensitive data in the reports as possible.

### 3.2.6 Debt collection, Assignment of claims

For the purposes of enforcing payment of our invoices, we engage third parties such as debt collection agencies. If you are disconnected due to non-payment, we may assign our claims to such third parties. In such a case we share all data with such parties as they require in order to be able to enforce payment. The debt collection agency processes your personal data under its own responsibility.

### 3.2.7 Telephone directories and subscriber information services

KPN processes your contact details (name, full address and telephone number) for the purposes of issuing electronic and printed telephone directories and offering subscriber information services. We will do so only if you have indicated that your telephone number may be published in a telephone directory and/or be obtainable from a subscriber information service. In such a case, KPN is required by law to share your data with other publishers of telephone directories and subscriber information services within the European Union (EU). This means that this data is made 'public'.

You may choose an 'unlisted number', also referred to as a 'confidential number'. This means that the telephone number will not be published in a telephone directory and cannot be obtained from a subscriber information service. You can also choose not to include the number in a directory, but for it to be available from a subscriber information service. If you have an 'unlisted number' this does not mean that your data cannot be used for trend analyses and marketing and sales activities. If you do not wish for your data to be used for trend analyses and marketing and sales activities, then you must indicate this separately. In the section headed ["Contact"](#), you can read about the choices available to you and how you can notify us of those choices.

You can notify us again if you change your mind. For more information about where you can submit your requests for registration, change of registration, or deletion, also check ["Contact"](#).

### 3.2.8 Caller ID

It is standard practice for KPN to show your number to the called party. If you do not wish for your telephone number to be visible to others, you can block your caller ID (on a one-off basis) per individual call. You can also block your caller ID permanently. You can find out how to do this under ["Contact"](#).

If you dial the emergency number 112 your telephone number will always be disclosed, even if you have blocked your caller ID. KPN is required to do so by law.

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### 3.2.9 Itemization of invoices

For itemized invoices, the telephone number of the called party may be included in the invoice for the calling party, unless there is an agreement with the contract holder of the called party that its number will be shielded on the invoices of other customers. In line with statutory provisions, this shielding means that the last four digits of the number will not be readable. You can find out how to request this 'B-number block' under the section headed 'Contact'.

KPN collaborates with other telecommunications providers to also shield your number on their invoices. But unfortunately, we cannot guarantee that your blocked number will never appear on the invoices of other providers.

### 3.2.10 Nuisance calls

If someone disturbs you with nuisance calls, you can report this to us. You can request us in writing to supply the contact details of the party from whose number the nuisance or malicious calls are made. If you make nuisance calls to someone, that other party can report this to us and make the same request.

You can send such a request to the address stated under "[Contact](#)". In this request you have to give the following data: a) your name, full address and postcode, b) the number to which the call has been made, c) a description of the nature and severity of the nuisance as a result of the annoying or malicious calls and d) an indication of the dates and times of the calls. If the identity of the caller is known to KPN, we notify the person in writing that you regard such calls as a nuisance and we urge them strongly to stop. Should this warning not help, then KPN will, as a last resort, give you the telephone number, name and address of the caller. The caller whose information has been disclosed in this way will be notified of the fact.

### 3.2.11 Device insurance

KPN collaborates with Chubb to offer the Device Insurance service. For this purpose, KPN sends your customer data to Chubb, such as your name, address and contact information, KPN-ID and information about your subscription and device. KPN has agreed terms with Chubb to ensure that Chubb respects your privacy. You can read about how Chubb deals with your personal data in Chubb's privacy statement at [chubb.com](http://chubb.com).

if you file a claim with Chubb, KPN will receive such information about the claim as is necessary for invoicing purposes. If you receive a replacement device from Chubb, Chubb will send us the IMEI number of your new device. We need the IMEI number to be able to provide our telephony services. If you change, cancel, or have terminated your device insurance via Chubb, we will be notified of this by Chubb. We process this information so that your subscription data remains complete and to be able to accurately invoice you.

## 3.3 FOR HOW LONG DO WE KEEP YOUR DATA?

KPN will not keep your data for longer than permitted by law and which is necessary for the purposes for which we use your data. The length of time that your data is kept depends on its nature and why it has been processed. Therefore the retention period may differ from one objective to another.

If you have a subscription with KPN, your personal data will in any event be kept for the duration of your subscription. We keep your non-itemized invoices for a maximum of seven years. We are required by law to keep your invoices this long for tax reasons. We keep your itemized invoices and your call data for invoicing purposes for a maximum period of six months. We keep consumption data that we process to ensure that you are contactable on your cell phone for a maximum period of two weeks for network purposes. Even if you do not communicate actively.



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### 3.4 WHAT DO WE DO WITH YOUR DATA WHEN THE RETENTION PERIOD ENDS?

When the retention period ends, your personal data will be deleted or anonymized. By anonymizing your data, we ensure that all possible features that could identify you are removed. What is left is statistical data that cannot be linked to you personally in any way whatsoever. This statistical data is important for us, because it provides us with information about how our products and services are used.

## 4 KPN INTERNET (FIXED AND MOBILE)

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### 4.1 WHICH OF YOUR DATA DO WE PROCESS?

#### 4.1.1 At time of registration, if you contact us

If you take out a subscription with us for an internet connection, register as a customer, or participate in a promotion, we process your data. This data includes your name, address, copy of your proof of identity or residence document, bank account number, e-mail address, date of birth, what services you buy from us, the type of subscription, and IP address, whether you register by telephone, via our websites or in one of our shops.

If you get in contact with us, your data will be registered. For example, we will record a question you ask us by telephone, via our website, our video assistance, or social media. We need to record the question in order to be able to answer it and to take the appropriate actions. Your data will be similarly registered if you report a fault, file a complaint, or fail to pay an invoice.

We refer to this data as 'contact data'.

#### 4.1.2 Use of the service

If you use our internet services, KPN will process technical data connected with this use and which is necessary to transport internet traffic over our network. Examples are:

- the date, technical data (date, time, and duration of an internet session, signal strength, signal quality, data speed, frequency band, modem memory use, and processor use and settings), technical identification data (such as user name and password), e-mail address, the application server with which the apps you use connect, your IP address, MAC address, IMEI number, the route taken by your data traffic over our network, data volume, the quality of your connection (e.g. fault reports) and the location data necessary to transport internet traffic over our network;
- data concerning the websites you have visited (URLs), needed to lead you to the correct site and parts of the site.

We call all this technical data 'consumption data'. This technical data we process does not contain the content of your communications over the internet.

Consumption data forms the basis for the invoices that we send you. Your invoice contains a summary of the MBs you have used and the total payment you owe us. This data we call 'usage data'.

### 4.2 WHAT DO WE DO WITH YOUR DATA?

#### 4.2.1 Service

The first reason for KPN to process your data is to be able to supply you with our services. To be able to deal with requests, we need to process your contact details. We need to process your URL data to be able to lead you to the right site, or right parts of the site. To be able to send you your invoice, we need to process not only your contact details, but also the data concerning the use of your connection, such as data volume. To prevent disruptions and to be able to respond to fault reports it is necessary to process

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certain usage data, such as the date, time and duration of an internet session, technical identification data (such as your user name and password), e-mail address, the application server to which the apps you use connect, your IP address, the route taken by your data traffic over our network, data volume, and the quality of your connection (e.g. error reports). Unless we process your data, we cannot fully supply you with our services.

### 4.2.2 Carrying out a risk analysis, credit registration

If you apply for a new (mobile) data/internet subscription, KPN will carry out a risk analysis. For this, KPN will construct, in collaboration with other providers of public telecommunications services, a database of contracting parties. These contracting parties are people who have been disconnected or whose contract has been terminated because of non-payment. This database is used by KPN and the other providers to make the right choices regarding acceptance of applications for telecommunication services. Stichting Preventel is responsible for this database. You can find more information on [www.preventel.nl](http://www.preventel.nl).

As soon as we receive a request for a (new) subscription or a renewal, your data will also be forwarded to Experian, a company credit report supplier. This also happens if you send in a credit application. All data pertaining to your payment history will also be shared with Experian, which processes this data under its own responsibility for analyses of credit worthiness, fraud prevention, debt collection and data quality validation. Experian can use this data to make an accurate risk analysis. If, as a result of payment arrears, you have ever had a contract terminated, this information may have consequences for other contracts that involve financial and other obligations. This applies to mobile telephony subscriptions entered into after January 1, 2010 and to fixed line subscriptions entered into after May 1, 2016. If you would like to know more about this subject, click [here](#).

### 4.2.3 Planning, management, our network security, spam filter/virus scan

KPN is responsible for the telecommunications network that carries the internet traffic. We are responsible for maintaining, planning, and improving the network and management. This includes routing traffic, resolving faults and monitoring peak load and overload. The analysis of network use provides us with essential information concerning the use of and load on our network. This information enables us to expand and improve our network in a focused way. KPN processes your data for these technical and statistical analyses. The results of these analyses will be reported in anonymized form within KPN so that the data is no longer traceable to individuals. We do not look at the content of communications.

We can also use data of the websites (URLs) you have visited, but only if you have given your consent to do so.

KPN is responsible for securing our network and your connection to this network, by applying advanced techniques (such as firewalls, spam filters and virus scanners) to protect against security breaches, viruses, spam and malware. For more information about securing your own connection, [click here](#).

To protect your connection and our network against security breaches, viruses, spam and malware, we automatically scan all internet traffic that enters and leaves our network using these security techniques. If we discover that, for example, a message contains a virus, we will remove this virus and deliver the message virus-free, unless it is spam.

### 4.2.4 Conforming with statutory requirements

In some circumstances KPN is required by law to provide your data to third parties. Examples include the supply of data to competent authorities in the context of a criminal investigation, or to copyright owners in the context of, for example, a judicial investigation into illegal downloading.

### 4.2.5 Improving services, informing you of opportunities to use the products and services you have purchased, trend analyses

KPN processes your contact details and usage data to improve our services and to inform you about options available to you. We can for example explain how to make optimum use of the products and services you purchase from us. If you object to the use of

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your usage data for this purpose, we of course will not do so. Your consumption data will be used only if you have given your consent. Data concerning the websites you have visited will not be processed for such purpose.

KPN uses statistical analyses to research trends in the market. We use the information obtained from these analyses in order to evaluate our products and services, as well as our processes, and to update them in line with new developments. We do not use these research results for marketing and sales activities tailored specifically to you. For these, we use your personal and usage data, unless you have made an objection. Your consumption data can also be used for this purpose, but only if you have given your consent.

### **4.2.6 Marketing and sales activities, supply to third parties**

KPN processes your personal and usage data for marketing and sales activities (even for a period of two years following termination of the contract) and for the benefit of KPN's own services, unless you have notified us that you object to this. We may also process your consumption data for our marketing and sales activities, but only if you have given your consent. Data concerning the websites you have visited will not be processed for such.

Your data is processed by KPN for the purposes of making offers and to inform you of the options for using the products or services you have purchased from us. If you are not yet a customer of KPN, we will be happy to inform you about the options offered by KPN. We will only do so if you have given your consent. We can share this information with you by letter, telephone or digitally (e.g. via SMS or e-mail), unless you have notified us that you object to being approached by letter, SMS, e-mail or telephone. You can indicate this separately. Read chapter 11.3 elsewhere in this privacy statement for more information.

KPN will not supply your data to third parties for marketing, sales, or other commercial activities. Insofar as data is supplied to third parties for activities, this is not for sales purposes, and will only happen in an anonymized and aggregated form.

If you are a customer of ING, KPN will share information with ING about sim card replacements that KPN undertakes on your behalf, in order to protect both you and ING against fraud. In supplying this data to ING, KPN will have regard to your privacy by shielding as much privacy-sensitive data in the reports as possible.

### **4.2.7 Debt collection, Assignment of claims**

For the purposes of enforcing payment of our invoices, we engage third parties such as debt collection agencies. If you are disconnected due to non-payment, we may assign our claims to such third parties. In such a case we share all data with such parties as they require in order to be able to enforce payment.

### **4.2.8 Handling complaints concerning illegal or unlawful information on the internet (notice & take down)**

If you come across information that is unlawfully or illegally available on the internet, you can notify us. If someone else has a complaint about unlawful or illegal information that you have distributed, then they can also notify us. We deal with all complaints on these matters in accordance with the procedure set out in the Code of Conduct "notice and take down" of the Government of the Netherlands, which you can read at [https://noticeandakedowncode.nl/wp-content/uploads/2018/12/ECP\\_01054-Gedragcode-notice-and-takedown-pdf-2.pdf](https://noticeandakedowncode.nl/wp-content/uploads/2018/12/ECP_01054-Gedragcode-notice-and-takedown-pdf-2.pdf). The Code of Conduct explains the procedure we will follow in response to a complaint and what measures we can take. These measures include denying access to or removing – under certain conditions – the information and the supply to third parties of your name and full address.

## **4.3 FOR HOW LONG DO WE KEEP YOUR DATA?**

KPN will not keep your data for longer than permitted by law and which is necessary for the purposes for which we use your data. The length of time that your data is kept depends on its nature and why it has been processed. Therefore the retention period may differ from one objective to another.

## KPN Privacy statement

If you have a subscription with KPN, your personal data will in any event be kept for the duration of your subscription. We keep your non-itemized invoices for a maximum of seven years. We are required to keep your invoices this long for tax reasons. We keep your usage data for invoicing purposes for a maximum period of six months. Data about sites (URLs) you have visited will not be recorded.

### 4.4 WHAT DO WE DO WITH YOUR DATA WHEN THE RETENTION PERIOD ENDS?

When the retention period ends, your personal data will be deleted or anonymized. By anonymizing your data, we ensure that all possible features that could identify you are removed. What is left is statistical data that cannot be linked to you personally in any way whatsoever. This statistical data is important for us, because it provides us with information about how our products and services are used.

## 5 KPN TV

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### 5.1 WHICH OF YOUR DATA DO WE PROCESS?

#### 5.1.1 At time of registration, if you contact us

If you take a subscription with us for KPN TV, become a customer of KPN or take part in a promotion, we process your data. This data includes your name, address, copy of your proof of identity or residence document, bank account number, e-mail address, date of birth, what services you buy from us, the type of television package, IP address, number of your TV receiver or smartcard, KPN - ID, TAN code and pin code. We always process this data, whether you have decided to subscribe to KPN TV by telephone, via our websites or in one of our shops. We need all this data to activate the service for you.

If you get in contact with us, your data will be registered. For example, we will record a question you ask us by telephone, via our websites or social media. We need to record the question in order to be able to answer it and to take the appropriate actions. Your data will be similarly registered if you report a fault, file a complaint, or fail to pay an invoice.

We refer to this data as 'contact data'.

#### 5.1.2 Carrying out a risk analysis, credit registration

As soon as we receive a request for a new television subscription or a renewal, your data will also be forwarded to Experian, a company credit report supplier. This also happens if you send in a credit application. All data pertaining to your payment history will also be shared with Experian. Experian processes this data under its own responsibility for analyses of credit worthiness, fraud prevention, debt collection and data quality validation. Experian can use this data to make an accurate risk analysis. If, as a result of payment arrears, you have ever had a contract terminated, this information may have consequences for other contracts that involve financial and other obligations.

#### 5.1.3 Use of the service

If you use our television services, KPN will process technical data connected with this use. This data is necessary to be able to supply our services to you, to supply on-demand items, and to schedule your recordings and ensure they remain available to you. It could include data such as:

- the date, time, and duration of the session, channels watched, zap data, data concerning the quality of your connection, and other technical data we need to be able to supply our TV services
- on-demand items ordered, the date and time of each order, data about watching, pausing, re-winding and fast-forwarding
- recordings made and scheduled, date and time of the recording, data about watching and pausing

## KPN Privacy statement

We regard data that tells us something about your viewing pattern as sensitive data.

On the invoice you can find a summary that shows the number of paid programs you have ordered, as well as the total amount you have to pay. This data we call 'usage data'.

### 5.2 WHAT DO WE DO WITH YOUR DATA?

#### 5.2.1 Service

##### *Showing the programs and invoicing*

The first reason for KPN to process your data is to be able to supply you with our services. To be able to deal with requests, we need to process your contact details. To show the correct programs, we need to process data concerning your choice of channel. To be able to send you your invoice, we need to process not only your contact details and choice of television package, but also certain data concerning the use of your connection, such as the pay-on-demand items that you ordered.

##### *Preventing and remedying faults*

To prevent any faults and to be able to deal with fault reports the processing of consumption data is necessary. This is data such as the date, time and duration of a session, technical identification data (such as your TAN code and the number of your TV receiver), quality of your connection, the channels you have watched, the recording and use of on-demand services such as 'Begin gemist', 'Programma gemist', and 'Videotheek', recording, rewinding, or fast-forwarding.

##### *On-demand services*

For on-demand services such as Begin gemist, Terugkijken, and Videotheek, programs are made available for you for a fixed period (e.g. 24 hours). We make recordings you made available to you for a maximum period of one year. If you watch an on-demand item or a recording, we offer you the option of pausing and resuming watching of the item or recording. For this purpose, we need to know not only what item you ordered or what program you recorded, but also the date and time of the order or recording, whether you watched the program, or paused the program, and at what point you paused the program.

##### *Méér TV*

Do you subscribe to 'Méér TV'? If so, we offer you the option of opening a number of apps via your TV menu, such as YouTube and Wikipedia. If you are watching a TV program and then switch to such an app, you will see the program you are watching filled in as a search term, with the corresponding search results. To enable this function, we supply information to the app provider about what program you are watching at that moment. We supply your data only if you have given your consent for this in advance. We ask for your consent in the television menu.

##### *Third-Party TV*

Third parties use our television network to be able to provide their own television services. If you purchase a television service from such a third party, KPN will process your data, such as your TAN code, the number of your TV receiver, TV channel, use of on-demand items, and recordings you have made. Unless we process your data, we cannot supply you with our services.

#### 5.2.2 Planning, management of our network

KPN is responsible for the network that carries the television traffic. We are responsible for maintaining, planning, and improving the network and management. This includes showing the right programs, improving picture quality, resolving faults, and monitoring peak load and overload. The analysis of network use provides us with necessary information concerning the use of and load on our network. This information enables us to expand and improve our network in a focused way. KPN processes your data for this technical and statistical analysis. The results of the analysis will be reported in an anonymized form within KPN. This ensures the data is no longer traceable to individuals. Your identity will always remain a secret.

#### 5.2.3 Conforming with statutory requirements

KPN is required by law to provide your data in some circumstances to third parties. Examples include the supply of data to owners of copyrights, in the context, for example, of a judicial investigation into hacking or illegal downloading or uploading.

## KPN Privacy statement

### 5.2.4 Market analyses for reports to content providers, improving services, and providing information about options for using the products and services you have purchased

#### *Content providers*

Content providers (program makers, broadcasting companies) are prepared to make their programs available via KPN's TV service only if KPN pays a fee. To calculate and to monitor the level of the fee, they require KPN to supply a report indicating how often certain programs have been ordered on-demand within a certain period and (in the case of iTV online) how often the app is logged on to.

We supply a report concerning the use of free on-demand items and a report concerning the use of paid on-demand items. KPN makes anonymized counts to be able to draw up the report on the use of free on-demand items. The report on the use of paid on-demand items is not entirely anonymized, because data about your use of paid on-demand items is also kept for invoicing. In both cases, however, we are not concerned about who has watched a program or who has ordered an item; we use the information only to determine how often a particular program has been ordered.

The aforesaid counts are processed by KPN into aggregated reports which indicate how often particular programs are ordered on-demand within a particular period. The aggregated reports do not contain any identifying data. In short, we separate your viewing pattern from your data, preserving your anonymity.

#### *Improving services*

The aforesaid aggregated reports are further processed by KPN to evaluate our products, services and processes and to update these in line with new developments.

### 5.2.5 Marketing and sales activities, supply to third parties

KPN processes your personal and usage data for marketing and sales activities (even for a period of two years following termination of the contract) and for the benefit of KPN's own services, unless you have notified us that you object to this.

Your data is processed by KPN for the purposes of making offers and to inform you of the options for using the products or services you have purchased from us. If you are not yet a customer of KPN, we will be happy to inform you about the options offered by KPN. We will only do so if you have given your consent. We can share this information with you by letter, telephone or digitally (e.g. via SMS or e-mail), unless you have notified us that you object to being approached by letter, SMS, e-mail, telephone or TV. You can indicate this separately. Read chapter 11.3 elsewhere in this privacy statement for more information.

KPN processes your usage data and data concerning your use of both free and paid on-demand items in order to draw up aggregated reports. These reports indicate how often particular programs are ordered on-demand within a particular period. The aggregated reports do not contain any identifying data. We use these reports for general market analyses and to improve our service. KPN makes anonymized counts to be able to draw up the report on use of free on-demand items. The drawing up of the report on the use of paid on-demand items is not entirely anonymized, because data about your use of paid on-demand items is also kept for invoicing. In both cases, however, we are not concerned about who has looked at a program or who has ordered an item. We only wish to determine how often a particular program is ordered.

We only process your usage data and sensitive data if you have given your consent. We only process your usage data and sensitive data such as which programs you have watched, which on-demand programs you have watched and/or ordered, or what recordings you have planned or made in order to offer you personal recommendations or to inform you of the options for using the products or services you have purchased from us.

KPN will not supply your data to third parties for marketing, sales, or other commercial activities. If data is supplied to third parties for the purposes of their activities, this will happen only in an anonymized and aggregated form. This means the data cannot be traced back to you by any method.

## KPN Privacy statement

### 5.2.6 Debt collection, Assignment of claims

For the purposes of enforcing payment of our invoices, we engage third parties such as debt collection agencies. If you are disconnected due to non-payment, we may assign our claims to such third parties. In such a case we share all data with such parties as they require in order to be able to enforce payment.

### 5.3 FOR HOW LONG DO WE KEEP YOUR DATA?

KPN will not keep your data for longer than permitted by law and which is necessary for the purposes for which we use your data. The length of time that your data is kept depends on its nature and why it has been processed. Therefore the retention period may differ from one objective to another.

If you have a subscription with KPN, your personal data will in any event be kept for the duration of your subscription. We keep your non-itemized invoices for a maximum of seven years. We are required to keep your invoices this long for tax reasons. We keep data about your television package and the on-demand items you have ordered for a maximum period of six months, for invoicing purposes. Data about your recordings will be kept for a maximum period of one year, unless you delete the recording sooner yourself. Data about the programs you have watched will be kept only for network purposes and for a period of 14 days. Aggregated and anonymized reports to assist content providers will be kept for a period of 13 months.

### 5.4 WHAT DO WE DO WITH YOUR DATA WHEN THE RETENTION PERIOD ENDS?

When the retention period ends, your personal data will be deleted or anonymized. By anonymizing your data, we ensure that all possible features that could identify you are removed. What is left is statistical data that cannot be linked to you personally in any way whatsoever. This statistical data is important for us, because it provides us with information about how our products and services are used. We can use this statistical data, for example, to count the number of times that a program is watched, ordered, or recorded.

### 5.5 PERSONAL RECOMMENDATIONS

KPN wants to make your TV experience more relevant through personal recommendations. You have to give explicit permission for this. If you give your permission, then we can present these recommendations as a banner or via a personal message on your TV.

For personal recommendations KPN makes a profile based on viewing patterns (choice of programs, series and films), contract data (gender, age if known, and what services you purchase) and the use of the television service (such as searches and menu navigation). This information is supplemented with demographic, geographic and economic data from outside sources. This data comes from Whooz and the government data portal.

Whooz makes detailed market analyses with characteristics and interests of households [www.whooz.nl](http://www.whooz.nl). The government data portal contains public data about such things as the average family composition and the economic situation in individual postcode areas. This data can be viewed by everyone on <https://data.overheid.nl/>.

The personal profiles that KPN makes for these recommendations to customers are not shared with third parties.

After giving your permission for the use of your data for personal recommendations via your TV you can also withdraw it at any time.



## KPN Privacy statement

### 6 KPN WEBSITES

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#### 6.1 WHICH OF YOUR DATA DO WE PROCESS?

##### 6.1.1 Visits to our website(s), logging on to the 'MijnKPN' dashboard

If you visit our website(s), we will process the following data:

- your IP address, the type and language of your browser, the time of your visit and the web address from where you reached our website, the pages that you view there, the links you click on, and other actions you take. To do this, we use cookies. You can find further information about our cookies and the choices available to you in this regard below
- on some KPN websites we ask you for additional personal information, such as your e-mail address, name, home or work address, or a telephone number. If you make a purchase or take out a subscription for a paid service, we ask you for additional information, such as your bank account number or number of an ID document. In addition, we will sometimes ask for profile or demographic data, such as your postcode, age, gender, preferences, interests, and favorites
- if you wish to access the 'MijnKPN' dashboard on our website(s) and app or if you make use of our service tools, then you must log in with your KPN-ID. You can use your KPN-ID on the basis of an e-mail address and a password
- by logging on to "MijnKPN" we also save data about the equipment that you use for access. This information is used to secure your account, to prevent fraudulent use of your information, and to provide you with information.

KPN websites use cookies (or comparable techniques) and 'page tagging' pixels (collectively referred to here as 'cookies'). Before a cookie is sent, we will notify you via our websites about the type of cookies we use and the options available to you in this regard (<https://www.kpn.com/algemeen/cookies.htm>).

By accepting cookies you can choose between two settings: 'Functional and analytical cookies', and 'Personal, within and outside the KPN website and app'.

You can select either 'No, I will set it myself' or 'Yes, that would be great'. 'No, I will set it myself' means that you have opted for 'Functional and analytical cookies'. In that case only functional and statistical cookies will be sent. These cookies ensure that our websites function well, that we can measure the use of our websites and quickly discover any problems. We use these cookies to prevent fraud and to secure our website(s) and apps. You cannot opt out of functional and analytical cookies.

If you opt for 'Yes, that would be great', that means you have chosen 'Personal, within and outside the KPN website and app'. In that case we will send social media and advertising cookies as well as the functional and statistical cookies. Social media cookies are intended for sharing our websites via social media. Advertising cookies are used to measure how often an advertisement on our website is viewed and to charge this to the advertiser. We combine the data that we collect using these social media and advertising cookies with your contact and usage data that we have obtained from you because you are one of our customers. This way we can improve our websites and our services, and send you advertising and offers that are better targeted to you individually.

Most online advertising that you see on KPN websites is produced by KPN itself. However, we also permit third-party advertising networks to place advertisements on KPN webpages. Some of these advertising networks place a permanent cookie to your computer to recognize your computer when they send you an online advertisement. By doing this, these networks can gather data about where you and others who use your computer saw the advertisements and what advertisements you clicked on. It also counts how often a click on a third-party advertisement on a KPN website leads to a purchase from that third-party's website. This information enables the advertising networks to provide targeted advertising that they believe will be of interest to you. KPN has no access to the cookies that are sent by third-party advertising networks. We do let you know what cookies are sent and which parties we allow on our website: this information can be found on our cookie page.



## KPN Privacy statement

### 6.2 WHAT DO WE DO WITH YOUR DATA?

#### 6.2.1 Service

We collect and use your data on our websites first and foremost to be able to supply our web services and other services and to communicate with you, for example to send you security warnings.

#### 6.2.2 Improving services and our websites, showing targeted advertising

Your (collated) data will also be used for research and for carrying out analyses, with the aim of improving our services and our websites. For example, if we know that users of our websites get in contact with our customer service about a certain subject after visiting our website, we can improve our online service. We also use this data to provide you with an improved, more personal service by, for example, changing the advertisements you see on our website(s) in line with your personal preferences. However, we will only do this if you have indicated that you accept cookies with the setting 'Personal, within and outside the KPN website and app'.

#### 6.2.3 Marketing and sales activities, supply to third parties

Lastly, we sometimes use your data to contact you via e-mail, SMS or telephone, with offers and information about other products and services of KPN. However, we will only do this if you have indicated that you accept cookies with the 'personal' setting and you have not objected to being contacted in this way.

KPN will not supply your data that we process via our websites to any third party.

#### 6.2.4 Service tools

Service tools are digital tools that we offer to customers so that we can assist you with specific requests for help. These tools process personal data that we need to be able to give you an added value service, including, for example, data from the network. If you opt for this, then our support departments can help you further with personal advice. At the start of each service tool you will get brief information about the actions that will be performed. To use the service tools go to [www.kpn.com/servicetools](http://www.kpn.com/servicetools) or MijnKPN.

### 6.3 FOR HOW LONG DO WE KEEP YOUR DATA?

KPN will not keep your data for longer than permitted by law and necessary for the purposes for which we use your data. The length of time that your data is kept depends on its nature and why it has been processed. Therefore the retention period may differ from one objective to another.

### 6.4 WHAT DO WE DO WITH YOUR DATA WHEN THE RETENTION PERIOD ENDS?

When the period for keeping your personal data ends, it will be deleted or anonymized. By anonymizing your data, we ensure that all possible features that could identify you are removed. What is left is statistical data that cannot be linked to you personally in any way whatsoever. This statistical data is important for us, because it provides us with information about how our products and services are used.

## 7 KPN APPS

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KPN supplies a range of apps. Which of your personal data we process, for what purpose, and for how long may differ per app. Therefore we would refer you to the KPN app that you use for more details about the processing of your personal data

## KPN Privacy statement

by that app and the possible choices that are available for you. This information will also be shown to you during the installation process for the app.

Our apps are intended to assist you as much as possible, and are being developed to provide the most optimal experience possible. Of course, we like to make this experience a personal one. We do this by combining information about your use of the app with contact and product data. For this purpose we sometimes need your permission. This is indicated in the relevant app.

KPN apps can also make use of cookies. Before a cookie is sent, we explain in our apps about the types of cookies that we use and the choices that you can make in regard to these cookies.

Download only the official apps from reliable app stores. Do not disable any protections on your device as this could risk malware installing itself on your device.

7.1 KPN Veilig (hyperlink to [KPN Veilig – privacy statement](#))

7.2 MijnKPN App (hyperlink to [MijnKPN app terms and conditions](#))

## 8 IN OUR STORES

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To protect our staff, customers, visitors, and personal property, KPN operates video camera surveillance within, for example, office buildings, technical buildings, shops, and sites of KPN. These cameras are very visibly positioned. Furthermore, before entering these KPN buildings you are warned about the use of video camera surveillance on the premises.

## 9 HOW IS YOUR DATA SHARED WITHIN KPN

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Many customers purchase several products or services from KPN. Maybe you purchase all of your services from the KPN brand, but perhaps you purchase your services from various KPN brands or various KPN divisions. To provide you with the best possible service, we combine the data that is in our possession because you are our customer.

We combine the information that we have gathered ourselves with information that we have received from other companies. For example, we use the services of other companies to enable us to obtain a broad picture of your geographical location based on your IP address, so that we can adapt our service accordingly.

We use this combined data for the following purposes:

### *Service*

Do you use several of our services? Then we link the information in our possession to provide the best possible service. This enables us to deal with your questions, reports (e.g. about any fault) and complaints quickly and adequately, even if you do not purchase all services from one brand or one division.

### *Improving services, offers*

We use the combined information to improve our services and to be able to adapt our network and our products and services portfolio to our customers' needs. We also use the information to inform you about, for example, offers that we think might be of interest to you. Of course we respect the choices you have made concerning your privacy.

If when accepting cookies on our website(s) you have chosen the option 'personal', we will link the data that we obtain from you via our websites to the data we have obtained via the services that we provide to you. We use this data for purposes including improving our online and offline services.

*Informing you about, and obtaining, the benefits of ordering several products from one address*

## KPN Privacy statement

There may be benefits available to you if you buy several products or services from KPN from your address. You can take advantage of these benefits even if not all of subscriptions registered to your home address are in the same name. For example, if a Mobile and an Internet subscription are purchased by you from KPN from the same address. Examples of this are KPN Compleet and KPN Hussen. To check if your household qualifies and to inform you about the benefits, we combine the data we have regarding the services used at your address. We do this once you have registered or when you take out a new subscription. Your mobile number and your contact details for the services you purchase from us will not be disclosed to persons you share a house with. If you do not wish your product data to be combined in this way, you can inform us of this by filing an objection to the sharing of your data within KPN for this purpose (see Ch 12.3.3.).

There may also be benefits available to you if you buy products or services from Simyo, Solcon, or XS4ALL and from KPN. Examples include Solcon -, Simyo - and XS4ALL Compleet. What benefits actually apply to you depends on your subscriptions. You can ask us to check whether you are eligible for the Compleet benefits. We will then combine the data that the various brands share about you to check your participation with the data that we hold regarding which of our services you use. This data is used only to provide you with the Compleet benefits.

### *Financial analysis*

To draw up financial analyses concerning the KPN Group we share within the group data such as the number and type of services purchased per address.

## 10 SHARING YOUR DATA WITH THIRD PARTIES

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### 10.1 WHAT WE DO NOT DO

#### 10.1.1 Selling your data to third parties for the purposes of marketing, sales, and similar commercial activities

KPN does not sell your data to third parties for marketing or similar commercial activities. If data is supplied for third-party activities, this will happen only in an anonymized and aggregated form. This means that there is no way the data can be traced back to any individual.

### 10.2 WHAT WE WILL DO

#### 10.2.1 Supply data to third parties engaged by us and our business partners

KPN engages third parties for specific network services, delivering our products, answering customer questions and for storage. If these third parties have access to your data for the purposes of performing the services, KPN has taken the required contractual and organizational steps to ensure that your data will only be processed for the aforesaid purposes. Even if KPN works with a party from outside the European Economic Area, we agree clear terms to protect the security of your data. In such cases we agree on standard terms as approved by the European Commission.

KPN also sells its products and services via selected partners, including external call centers that we have selected with care. For this purpose KPN supplies contact details and usage data to its partners.

#### 10.2.2 The supply of data in the context of a wholesale relationship

Third parties use our television network to be able to provide their own television services. Are you purchasing a television service from such a third party? KPN will process your data as mentioned above, such as your TAN code, the number of your TV receiver, choice of channel, use of on-demand items, and recordings you have made. KPN processes this data only to enable your television provider to supply its television service. For this purpose, KPN will also supply this data to your television provider.

## KPN Privacy statement

### 10.2.3 Supplying data to competent authorities

In some circumstances KPN is required by law to provide your data to third parties. These include the supply of data to competent authorities in the context of, for example, detection and a criminal investigation, or the supply of information to copyright owners such as in the context of a judicial investigation into illegal downloading. You can find more information about this on the websites of the national government and the [police](#).

### 10.2.4 Supplying data to publishers of directories and subscriber information services

If you have indicated that your telephone number may be included in the telephone directory and/or obtainable from a subscriber information service, KPN is required by law to forward the data needed for your inclusion in the directory to publishers of other telephone directories and subscriber information services. You can change the inclusion of your data at any time via [www.mijnnummervermelding.nl](http://www.mijnnummervermelding.nl).

### 10.2.5 Supplying data concerning protected B-numbers to other providers

If you have a blocked B-number, we will supply your number to other providers for the purposes of shielding the called number on the invoice.

### 10.2.6 Giving your number to 112

If you dial the emergency number 112, your telephone number will always be disclosed, even if you have blocked your caller ID, KPN is required by law to forward your phone number.

### 10.2.7 Supplying (anonymized) data to television - content providers

To be able to comply with our reporting and payment obligations in respect to content providers (television program makers, broadcasters) KPN draws up reports that include data about how often certain programs are ordered on-demand within a certain period. The aggregated reports do not contain any identifying data. Your identity remains unknown to these providers.

### 10.2.8 Supplying data to third parties for the purpose of carrying out a risk analysis and for credit registration

In collaboration with other providers of public telecommunications services, KPN constructs a database of contracting parties who have been disconnected. It also includes people whose contract has been terminated because they have failed to comply with their payment and other obligations. This database is intended for use by KPN and these providers, in the context of deciding whether to accept applications for telecommunication services. Stichting Preventel is responsible for this database. You can find out from them whether and how you are included in this database. If you disagree with the way you have been included in this database, you can make an objection. Requests for information or objections should be sent to Stichting Preventel, Postbus 744, 7400 AS Deventer. For more information, go to [www.preventel.nl](http://www.preventel.nl).

As soon as we receive a request for a (new) subscription or a renewal, your data will also be forwarded to Experian, a company credit report supplier. This also happens if you send in a credit application. All data pertaining to your payment history will also be shared with Experian. Experian processes this data under its own responsibility for analyses of credit worthiness, fraud prevention, debt collection and data quality validation. Experian can use this data to make an accurate risk analysis. If, as a result of payment arrears, you have ever had a contract terminated, this information may have consequences for other contracts that involve financial and other obligations. This applies to mobile telephony subscriptions entered into after January 1, 2010 and to fixed line subscriptions entered into after May 1, 2016. If you would like to know more about this subject, click [here](#).

## KPN Privacy statement

If you wish to file an objection or require information about the way you have been included in Experian's risk analysis, you can contact Experian via this website <http://www.experian.nl>. Or you can [contact](#) us via our KPN Customer Relations department.

### **10.2.9 Supplying data concerning nuisance phone calls and complaints concerning illegal or unlawful information on the internet (notice & take down)**

If someone disturbs you with nuisance phone calls or you come across information that is unlawfully or illegally available on the internet, you can notify us. Would you like to know who is making these nuisance or malicious calls? Send us a written request to supply the contact data of the caller. If you make nuisance calls to someone else or if someone comes across information from you that is unlawfully or illegally available on the internet, that other party can report this to us and make the same request. If we receive such a request, we will follow the procedure described in 3.2.11. Should this not help, KPN will supply your telephone number, name and address to the complainant.

### **10.2.10 Device insurance**

You can find more information about supplying data for the Device insurance service under paragraph 3.2.12.

### **10.2.11 The supply of data to third parties when you register for their service and this data is used by them for authentication and prevention of fraud**

To prevent the misuse of your data, other providers of products and services may ask KPN to verify data that you have given them. This may be done on the basis of a legitimate interest. Dependent on the request made by the provider, this may involve checking account data (hashed versions of your name, address, telephone number, date of birth) or requesting a date/time of a sim swap. After the check, we will only notify this provider whether or not your data is correct (with the answer yes or no) or we will only send a date/time when you started using your sim card. These checks can help prevent fraud.

Click [here](#) for a fuller explanation. For more information about prevention of fraud or verification of identity you should also read the relevant terms and conditions and privacy statements of the providers themselves.

### **10.2.12 Supply of data to parties when you pay for purchases via your KPN invoice**

If you use KPN Pay to pay for your online purchases in the App Store, the Google Play Store, or the Microsoft Store, or if you pay for third-party services via your KPN invoice, then we share your data to confirm that your payments are being made via KPN. The third parties are responsible for the processing of your personal data so that you can use the services of these parties. If you want to learn about how these parties process your personal data or how you can exercise your rights, you can find this information in these parties' privacy statements.

## **11 YOUR RIGHTS (INSPECTION, CORRECTION, OBJECTION)**

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### **11.1 INSPECTING YOUR DATA**

You have the right to inspect your personal data. This means you can request to see which of your personal data has been registered and for what purposes we use this data.

There are several ways of doing this. If you want information about the calls you have made or films and other on-demand items you have ordered, we refer you in the first instance to the "MijnKPN" dashboard on our websites (under "your data") and to the MijnKPN app. Here you will find not only your personal data, but also your itemized invoice.

## KPN Privacy statement

On certain matters we give you the option of indicating whether you wish for your data to be processed, for example for carrying out analyses or to be contacted for commercial purposes such as offers. You can find a clear summary of the choices you have indicated to us on the MijnKPN' dashboard on our websites (under 'your data') and on the MijnKPN app. You can see here not only what choices we have registered but we also enable you to easily change those choices at any time.

If you cannot find the information you are looking for via our websites or on our app, you can send us a letter with a request for inspection. Include your name, address, fixed and/or mobile telephone number and a shielded copy (without passport photo and BSN number) of a valid identity document. You can send the letter to the address indicated below under the heading "[Contact](#)". We will reply to you within four weeks.

### 11.2 CORRECTING YOUR DATA

You have the right to alter your personal data if they are not correct. For this, contact us as stated under '[Contact](#)'. We will give you a written reply within four weeks.

### 11.3 RIGHT TO OBJECT, PERMISSION TO PROCESS YOUR DATA

#### 11.3.1 Objection to KPN processing your personal data

You can object to the processing of your personal data by KPN for purposes other than those necessary to perform a contract or to comply with any legal obligation. So, for example, you can object to the use of your personal data for analysis, marketing and sales activities. You can do this via the "MijnKPN" dashboard on our websites (under the heading "your data") or on the MijnKPN app. You can vary your choice at any time.

For this, contact us as stated under '[Contact](#)'.

#### 11.3.2 Consent to process your call and location data and data concerning viewing pattern

Some data is used only if you have given your consent. This involves privacy sensitive data that is not necessary for the performance of a contract or to comply with any legal obligation. This includes using your call data to offer you a subscription that best suits your needs or for processing data about your viewing pattern to provide you with personal viewing advice. In such cases we will always seek your consent in advance before we use your data for such purposes. If you do not wish your data to be used for these purposes, do not give us your consent. This does not influence the use of our services.

If you previously gave your consent for us to process your sensitive data for the purposes mentioned above, you can withdraw that consent at any time. You can do this via the "MijnKPN" dashboard on our websites (under the heading "your data") or on the MijnKPN app. You can alter your choice at any time.

You can also contact us for this, as stated under '[Contact](#)'.

#### 11.3.3 Objection to your data being shared within KPN

If you do not want KPN to share your data with other KPN brands or divisions or do not want your data to be combined so we can check whether your address is eligible for KPN Compleet, you can object to this. You can do so via the MijnKPN dashboard on our websites (under the heading "your data") or on the MijnKPN app. You can alter your choice at any time.

Here too, you can contact us as stated under '[Contact](#)'. You should indicate clearly in the letter what uses of your data you object to. Do you only object to your data being shared? Or do you object to use of your data by KPN, or both? We will give you a written reply within four weeks after sending us this objection.

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### 11.3.4 Objection to being approached

You can object to being approached by KPN or you can withdraw your consent for purposes other than those necessary to perform a contract or to comply with any legal obligation. So, for example, you can object to being approached for sales activities.

You can object to any of the following forms of approach individually:

- approach in writing
- approach via SMS/e-mail
- telemarketing
- approach via TV

You can do this via the “MijnKPN” dashboard on our websites (under the heading “your data”) or on the MijnKPN app. You can also unsubscribe by following the instructions in the mails that we send you or by indicating at the end of a telephone call that you no longer wish to be called by KPN. You can vary your choice at any time. Would you prefer to contact us? You will find how to do so under the section headed ['Contact'](#).

KPN will process your objection as soon as possible. However, it may take some time before your objection has been processed into all files. During this time you may still be approached.

### 11.4 Right to be forgotten

In some situations you have the right to have your personal data erased. You have; for example, previously given your express consent to KPN for the use of your data, but you now withdraw that consent. KPN will then erase your data. KPN cannot always honor a request for erasure of your data. Sometimes we are under a statutory or other obligation to store your data, for example, if the personal data is still needed for the purposes for which it was obtained.

### 11.5 Right to data portability

You have the right to receive your personal data held by KPN. In this way you can easily forward it to another supplier of the same kind of service. You can also request KPN to forward this data directly to another organization.

## 12 CONTACT

Purpose/reason	Write to	Call or send SMS to Customer Service, free of charge, available 24/7	More information available on our website/service app
Right to inspection, correction, erasure and data portability	KPN Customer Reactions (quoting “GDPR Rights”) Postbus 58800 1040 JA Amsterdam (Netherlands) rechtenavg@kpn.com  For verification purposes, please add your name, address, fixed and/ mobile phone number, and a shielded copy of your proof of identity to your request.		

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Objection to the use of your data for analyses, marketing			<a href="http://www.kpn.com/uwgegevens">www.kpn.com/uwgegevens</a>
Objection to being approached in writing	KPN (quoting 'GDPR') Postbus 2547 3500 GM Utrecht		<a href="http://www.kpn.com/uwgegevens">www.kpn.com/uwgegevens</a>
Objection to being approached by e-mail/SMS	If you are a business customer, SMS "STOP" to 1683	Call 0800-0402 for fixed telephony Call 0800-0105 for mobile telephony	<a href="http://www.kpn.com/uwgegevens">www.kpn.com/uwgegevens</a>
Objection to being approached by telephone		Call 0800-0402 for fixed telephony Call 0800-0105 for mobile telephony	<a href="http://www.kpn.com/uwgegevens">www.kpn.com/uwgegevens</a>
Objection to being approached via TV			Via the TVmenu
Correcting a BKR registration	KPN Risk Control Postbus 13500 9700 EG Groningen		
Deletion of data from telephone directory/subscriber information file		Call 0800-0402	Go to your Mijn KPN account on our website and select 'Thuis bellen'
Blocking Caller ID		Permanent blocking: Call 0800-0402 for fixed telephony Call 0800-0105 for mobile telephony Blocking per call: key in *31* before dialing the required number	
Reporting nuisance phone calls		Call 0800-0402	
Request for previous version of Privacy Statement	KPN Customer Reactions (stipulating "request for previous privacy statement") Postbus 58800 1040 JA Amsterdam (Netherlands)		
Telephone claim concerning judgment of the Supreme Court	KPN Mobile Attn. CMU/team 1 Inzake opvragen dossier (regarding file request) Postbus 13500 9700 EG Groningen		<a href="http://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:HR:2016:236">uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:HR:2016:236</a>
Data Protection Officer	Mr J. Jongenelen Email to: privacyofficer@kpn.com		