

29.5.2015

Elisa's data protection principles

Abstract

This summary describes the basic principles of how Elisa collects different kinds of information about its customers. The matters described in the abstract are explained in more detail in these Elisa's data protection principles.

How do we collect data about you?

- Collecting your personal information (such as name and contact information) is most often based on your customer relationship or some other relevant connection with us. For instance, we collect data when you sign an agreement with us, register as a user of our service, use Elisa's services, or otherwise provide us with information.
- When you use Elisa's network and communication services, for instance by making a call or sending an SMS or e-mail, traffic data is stored in our systems for the use of the network and services.
- When you visit Elisa's websites or load pages from them, you leave us different kinds of anonymous browsing data, such as your IP address and browsing history. Monitoring is based on the use of cookies.
- We may collect data based on your given consent.
- We record customer service calls to be able to verify the actual discussion, if necessary.
- We also collect our potential customers' information when they participate in competitions, draws or customer events.
- We also update our data from public address information sources, such as Posti and the Population Register Centre.

We also use the names "customer information" and "account information" for personal data, and "network trace" or "information created during communication" for traffic data.



26.5.2015

What data do we collect?

- The personal data collected is defined in more detail in the Description of the File for Elisa's customer file, which can be found at www.elisa.fi/asiakaspalvelu. This data includes your name, address, telephone number, e-mail address and direct marketing blocks and consent, information on company contact person, information provided by you yourself, customer classification information, order, delivery, agreement and invoicing information, and other information we store that can be connected to you.
- Data created and collected during communication includes information on the communicating parties, time of the connection, routing information, data transfer protocol, format of the connection, and location information.
- During internet browsing, so-called "measurement data" is collected with the help of cookies. This data cannot be connected to a person.

How do we process your information?

- Please note that Elisa's entire personnel and its subcontractors are acting under an obligation of secrecy when processing information related to you.
- We maintain the confidentiality of the information concerning you and ensure that it is only used for the predefined purposes.
- Your information is processed for the purposes of producing and delivering the agreed communication and other services, developing the services, invoicing, providing you the best and most comprehensive service possible, and informing you of our services.
- We also use your information for customer communication, such as sending information concerning our services and for direct marketing purposes.
- We also use the data for customer profiling with the help of invoicing, usage amounts, duration of the customer relationship and external classifications. We utilise both summarised usage data and person-specific data to create target groups for marketing.
- We process the information of our potential customers for direct marketing purposes.
- We strive to ensure that the customer information is up to date and correct.
- We delete obsolete and unnecessary data when possible.
- We protect all information concerning you through task-based, personal access rights and prevent the access of outsiders to the data.

Where do we submit your data?

26.5.2015

- We only submit your information to the extent allowed by the relevant legislation and as specified in the Description of the File to the authorities and other telecommunications companies.
- If we use subcontractors, we will sign a security agreement with them that also covers the use of your information. We are also responsible for this kind of processing to you.

Elisa's data protection principles

The purpose of this data protection policy is to describe the principles and practices that we observe at Elisa to ensure the privacy protection, confidentiality of communication and legal protection of our customers.

Elisa updates this policy regularly as the operations or services change or develop. Because of this, we encourage you to regularly review the latest statement.

Elisa Rahoitus Oy, which operates under the supervision of the Finnish Financial Supervisory Authority as a body with a payment institution permission and the permission to issue electronic money, observes Elisa's data protection procedures described herein as applicable, with special consideration of banking secrecy and regulations concerning payment institutions. The Description of File for Elisa Rahoitus can be found on the website of Elisa Lompakko at www.elisa.fi/lompakko.

Basic values important to Elisa include the confidentiality of communication and protection of the privacy of customers.

Basic values important to Elisa include the confidentiality of customer data and communication, as well as protection of the privacy of customers in all of the company's operations. When processing personal information of our customers, we follow Finnish legislation, orders and instructions of the authorities and good data processing practices.

Elisa implements a high level of data protection. Personal information and traffic data as well as location-related data is only collected for specific predefined and legal purposes and is not processed in a way incompatible with these purposes.



26.5.2015

We constantly train our personnel on the principles of data processing and monitor the use of the information by appropriate means.

The general principles of processing customer information

The processing of personal information must always be properly justified by Elisa's operations. Elisa has defined the purpose of collecting, processing and disclosing personal information in the Description of File for its customer register. The Description of File can be found at www.elisa.fi/asiakaspalvelu. Elisa only processes customer data necessary for its operations, as defined in the purpose of use stated in the Description of File for the customer register. We strive to ensure that we do not process incorrect, incomplete or obsolete data.

The processes of customer data is usually based on a pertinent relationship, such as an agreement you have signed with Elisa, information received during the use of or registration for a service, or your given consent. We can process information about you based on other grounds as well, such as at your own request or when compelled by legislation. Your information can be processed within the Elisa Group. We regularly update your contact information by using the public address services of Posti and the Population Register Centre. Elisa checks for any marketing blocks from Suomen Asiakkuusmarkkinointiliitto's blocking service approximately once a month.

We record your conversations with our customer service to verify a business transaction and to monitor and develop the quality of service.

Please note that as an Elisa customer, you are entitled to inspect what information concerning you has been stored in our information systems, or that there are no information concerning you in our file. You can also deny the use of your information as provided by the relevant legislation. The inspection can be made once a year without charge. The request to inspect the data must be made with a document that is signed or verified in a comparable manner, or in person at an Elisa store.

Disclosure of information

Elisa may disclose your information to a third party only in the extent permitted by law. We mainly disclose data to authorities such as Finnish Communication Regulatory Authority, Data protection ombudsman, police and emergency response authorities or to other authorities with grounds specified in the legislation or with a



26.5.2015

decision of a competent authority. We may disclose information about you to subcontractors, but in that case Elisa remains responsible for confidentiality and processing of the information.

Your information may be processed outside EU/EEA region for example due to development and maintenance of invoicing and customer data systems. Reasons for such processing may relate to, for example, quality improvement, expertise required or improving the efficiency of processes. If we transfer information about you to a subcontractor outside EU/EEA region we will protect the data and ensure cautious and permitted processing of the data by signing a security agreement and an agreement with EU Standard Contractual Clauses (Model Clauses) with the subcontractor. Data may be processed for example in India, Israel or South-Africa.

Processing traffic and location data related to electronic communication

Elisa treats all data and messages created during communication as confidential. Our personnel is bound by an obligation of secrecy and a prohibition of using any messages or other confidential information.

When communication takes place through a network it always leaves a trace. These network traces are called traffic data if they can be connected to a person. Network traces are created, for instance, when making telephone calls, sending e-mail and SMS messages, and browsing the internet, and may contain information on the communicating parties, the connection route or routing, the data transfer protocol used, the time of the event, and the terminal devices used or their location.

Elisa processes the traffic data and location data of communication according to Information Society Code (917/2014) for the purposes, for instance, of implementing and using services as well as invoicing, technical development and, with the customer's consent, marketing. The information can also be used for the invoicing of other service providers to the extent that this is necessary.

Elisa may also process traffic data in cases of misuse, breach of data security and fault repair.

In all of the above situations, we only process traffic data and location data to the extent that it is necessary to accomplish a certain specific task.

Utilising location data

Location data indicates the geographical location of a mobile phone. It is used for offering location services and as a technical aid in transmitting communication. The more base stations there are in a certain area, the more accurately the location of a subscription can be established. In a densely populated area, location can



26.5.2015

be established with an accuracy of a few hundred metres, but in sparsely populated areas, the accuracy may be no better than several kilometres.

Location data can be utilised in various services, for instance, when a customer orders the information on the nearest pharmacy or restaurant to their phone.

Actual locating where another person can track where another person is located requires the consent of the person to be located. For a child under 15 years of age, the consent is provided by a parent or guardian. Actual locating services may be offered by other service providers in addition to Elisa.

If we submit location information to providers of locating services, we ensure through appropriate means that there is a consent from the person to be located.

Our customer is also entitled to obtain the traffic data indicating the location of a subscription or terminal device they are using to the extent allowed by the relevant legislation. A parent or guardian can make the request on behalf of a child under 15 years of age. For other persons without legal capacity, the request can be made by their guardian.

Persons authorised to process traffic data and location data

Only specific persons at Elisa whose work requires access to traffic data and location data may process such data. In practice, the authorisation is only granted to persons performing tasks related to invoicing, the maintenance or development of communications networks or services, the prevention and investigation of misuse, or customer service and marketing. Persons granted the right to process the data may only process it to the extent required for performing individual tasks.

Duration of the processing of traffic data and location data and storage of the data

We process traffic data and location data for as long as is required for the purposes of invoicing, technical development, fault repair, marketing, the investigation of misuse, or data security. However, processing only takes place to the extent required by the actions and without unduly compromising the confidentiality of a message and the protection of privacy.

We store data required for invoicing for at least three months from the due date of the invoice and for no longer than three years from the due date of the invoice, unless it is necessary to store the data for a longer period of time due to reasons related to collecting the invoice. Otherwise, the data is stored to the extent allowed and required by the relevant legislation.



26.5.2015

Visiting websites

We also collect data concerning visits to websites. Such data includes the IP address and the corresponding DNS name, the organisation that registered the IP address, the name and address of the visited page, the time of loading the page and the type of the browser.

Please note that the IP address is a required identification for the functioning of the internet, used for directing the messages transmitted over the internet to the correct places. As a rule, the IP address is not connected to the person using the computer, but it can be connected to the organisation that registered the IP address. The IP address connection can be established at the request of the authorities.

Cookies

As Elisa's customer, you can browse our websites anonymously. However, like other websites, we are using the cookie technology. When you first contact our service, the cookie sets a random number for the browser that does not indicate your identity. The cookies help Elisa determine which are the most popular sections of its websites, where do the visitors go and how long do they stay there. The data is used for implementing and developing services and targeting advertisements on the websites.

You can prevent the cookie from being stored by changing your browser settings. In some cases, the prevention may lead to slower browsing of the pages or the website not working at all.

Information security

We ensure the information security of our services by using methods that are in proportion to the severity and sophistication of the threats as well as the cost. Elisa is careful in performing actions that aim at preventing breaches of data security or eliminating disturbances that affect data security. In addition, we use all means to ensure that the confidentiality of messages or the protection of privacy is not unduly compromised when performing the above actions.

We provide information on actions related to information security of our services and other matters concerning information security through appropriate channels, such as our website or customer bulletins.

In order to prevent breaches of information security and eliminate disturbances affecting information security, we may take the required action by, among other things, preventing the reception of e-mail messages, removing viruses and other malware from the messages, and taking other comparable technical measures neces-



26.5.2015

sary within the allowed and required limits specified in the relevant legislation. We use physical, administrative and technical protection measures to ensure the secrecy of messages and traffic data transmitted over the communications network. These actions decrease the risk of data concerning you being disclosed to third parties and prevent misuse and other unauthorised access. Some of our services also use standardised encryption methods.

Please note that as an Elisa customer, you should also use the most appropriate methods to ensure your own information security. We encourage you to store and use our services and your terminal devices carefully and control their use, e.g. by employing PIN codes, and to use sufficient antivirus and firewall services and keep them as well as the operating system updated.

Identification of the subscription

Identifying the subscription refers to displaying the calling number to the other person when making a call. Blocks against identification are available for subscriptions operating in Elisa's network. You can obtain detailed information on the blocks in the instructions delivered with the agreement, through online channels, our customer service and our shops.

Blocks of subscription identification only apply to voice transmission services. When using other services, identification of the subscription cannot be prevented and the ID of the subscription may be transmitted to the other party of the connection despite the use of a block.

Blocks against identifying the subscription do not apply to emergency calls. The number of the calling subscription is always transmitted to the authorities.

Customer communications and direct marketing

Elisa sends customer messages concerning its products and services to its customers without a separate consent.

Elisa also sends direct marketing messages in electronic format. You have the right to forbid Elisa from sending any direct marketing messages. You can forbid marketing via SMS messages by using the OmaElisa and OmaSaunalahti online service channels or by following the instructions included in the direct marketing message.

Some subscription types include an automatic consent to direct marketing as specified in the terms of agreement (e.g. the Norppa+ subscription). If you wish to stop receiving the messages for these subscriptions, you



26.5.2015

will need to change the subscription type. Our goal is to only send current and useful information and to keep the amount of messages reasonable.

Publishing your contact information in directory services

Telecommunication companies are obligated to also deliver information submitted for directory publications, to other providers as well as directory and number information services. Elisa cooperates with Eniro and Fonecta in fulfilling its legal obligation to publish its customer's basic information, if the customer so wishes, in a telephone directory and a number information service. The basic information to publish include the customer's name, address and telephone number.

The information you have provided to Elisa for publishing is forwarded to a national database maintained by Suomen Numeropalvelu Oy (SNOY). You have the right to deny the publishing of data concerning you in a directory service. The national database must submit the name, address and telephone subscription number to any company for the purpose of maintaining a telephone directory or number information service. The SNOY database provides information to Finnish number information services, such as the 118, 0100100, 020202, and 020200 numbers, as well as to online directory services. However, the publisher of the directory and the service provider are responsible for the information they publish.

You have the right to deny the publishing of information concerning you in the directories fully or in part. You can also forbid the information from being forwarded further by informing our customer service. In addition, if the published information contains an error, we will try to fix the error at your request as soon as possible.

Secret telephone numbers

You must separately agree on a secret telephone number with Elisa. If you wish to use a secret number, we recommend changing the number or opening a new subscription.

Online services and mobile applications

Elisa may collect information about you from the online services and mobile applications (later Services) that you use or from devices that use these Services. By approving these data protecting principles by Elisa you give consent and permission to collecting, storing and processing your information as specified hereunder.

Information we collect about you through the Services

Elisa may collect and process the following information about you. The information may be collected by Elisa or be submitted to Elisa by a third party.



26.5.2015

Personal information and registration information

Elisa identifies you always when identifying the user is necessary for registering to a service, using the service, improving the quality and usability of the service, for data protection or other reasons. In registration and identification process Elisa may collect or store your information such as:

complete or partial name, email, date of birth, gender, social security number, electronic client identifier, picture of you, credit or debit card number, number of a loyal customer card, phone number, mobile number, place of residence or country, language and all information you give when you register or use Elisa's services. Elisa may get personal information or registration information from third parties if you have permitted it in a service by Elisa or a third party.

Information related to use of service

Elisa collects and stores information about you when you are using Elisa's services. This information may include, for example:

Information by service

Hobbies, preferences, interests, clicks to an advertisement, contact information from your devices, services and applications as well as other information on the use of services and applications.

Your services and content you use, time of use, where and how you use services, your search words, call, message SMS, or email logs, time, duration and other log information, and the internet address of the site you are using the service from.

Technical information

The make and model of your device, operating system, version of the operating system, identifying information of your device or applications such as serial numbers and other specifying information, or a combination of these, internet address or other mobile or data network identification information.

Elisa has the right to collect information about the function, log files, errors, malfunctions of the applications in your devices, the content of public and private cookies, the amount of data the Services use, the purpose of the use, the time of use and other functions of the applications.

Location

26.5.2015

By utilizing the location information from the tracking feature of your device, information available from information networks and magnetic fields, information available from mobile networks or information acquired in any other way. Location information is collected based on past or present location data.

Information related to paying and purchases

The information of credit or debit cards granted by Elisa including the place and time the purchase was made, specific information of the purchase, shipment data and location data connected to it and other possible information related to the use of credit or debit card.

Other information

Elisa may collect and store also other information than specifically mentioned in these data protection principles. In those cases Elisa will always ask for your separate approval before collection and use of that data.

Use of information collected from Services

We may use your information for developing the services you use, improving your user experience, making your services safer, for solving cases of misuse and producing new services.

We may use your information also for improving our marketing and sales, targeted marketing and for showing you only advertisements and content you are interested in based on the information collected.

Elisa will provide the information of the collection and use of your information. Elisa will ask permission separately, when necessary, for collection and use of specific data.

Example: You are driving to your summer cottage and you get a message in your phone 15 min before your favourite rest place offering a meal for a half the normal price. You can order lunch on the way by replying the message.

In the case of this example Elisa has collected with your permission you geographic data or location data, and using the information companies can send you offers related to your location. In this case Elisa shall not transfer any information about you to partners either.

Combining the information

26.5.2015

Elisa may not combine the information collected about you in a Service or stored or obtained from the use of other Services in other similarly obtained information or combine this information to your personal or registered information.

