

FØROYATELE



Personal Data Policy

Journal edition 1.0

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When we provide you with products and services, we process a series of your personal data. Therefore, it is important to us that you understand how we collect and process these data. The following policy statement discloses how we register and use your personal data when you use our products and services, including our websites. The policy discloses which data we collect, why they are collected, how they are collected, and for which purpose, in addition to stating your legal rights.

This policy applies to all who use our products and services. Specific subscription terms and conditions, e.g. relating to purchases etc., take precedence over this policy.

1. Who is liable for the processing of your personal data?

FT Samskifti pf.

Klingran 5

PO Box 27

110 Tórshavn

FT Samskifti pf. – hereinafter FT Samskifti – determines the purpose and means of the personal data process. This means, that FT Samskifti is the “data controller”. If you have any questions regarding the policy or processing of your personal data, please contact us via email at dpo@ft.fo.

2. How do we register and use your personal data?

We collect personal data in three ways:

- Data, which you provide, for example when subscribing with us
- Data, which we collect automatically, and data, which are produced when using our services
- Data, which we receive from third parties

For certain situations, products, and services, we need further data in addition to those data, which we normally ask for, however, in such cases, we provide specific information on terms and conditions relating to the situation, product, or service in question.

We do not register sensitive data in general. Should it, however, be necessary as an exception, we will ask for specific consent for the registration of said sensitive data, unless we are obliged or have the legal right to register sensitive data.

2.1 Data, which you provide, for example when subscribing with us

When you purchase or receive one of our services, we need certain personal data.

We need the following data, when you purchase or receive a telecom product and/or service:

- Your name, telephone number, address, email, and other information, which you provide us with, when you subscribe as a user of our services.
- Data concerning payment card, bank account, and other such data, which we need in order to administer your payments to us.
- The services, which we provide through our website, such as Mítt Ver, are contingent upon you creating an account with us. In order to create an account, we need your name, telephone number, email, and a password.

We need the following data, if you choose to receive newsletters, marketing material etc.:

- Contact information such as name, telephone number, email, and address.

2.2 Data, which we collect automatically, and data, which are produced when using our services

When using our services, data regarding you and your device (computer, smartphone, tablet, or other) is automatically collected. Which data is collected depends on the service and the device you use in order to access that service.

When you use our telecom services, we automatically collect the following data:

- The telephone numbers to which you place a call/send a text message, or from which you receive a call/text message.
- Date and time of calls and text messages, which you place/send or receive.
- The length of incoming calls, and calls, which are placed via our network, in addition to your approximate location at the time of calling. Location is further described below.

Location registration

We collect data regarding your location, when you use our telecom services. This includes, for example, data on where your device is located on our network, which gives us an approximation of where you are located geographically. These data are necessary in order to provide you with mobile connection.

If, when using services or offers that are based on location, you consent to your location being used, we may collect and register data on your location on our network or possible positioning data produced by the Global Positioning System (GPS). GPS data give a much more precise indication of where you are located geographically.

When you visit our website and/or use our online services and self-services, we automatically collect the following data:

- The IP address assigned to your device (computer, smartphone, tablet, or other) as well as device settings and model.
- Data on when, where, and how you have made use of the service.
- Login data.
- Data on your visit, including which website lead you to our website, which subpages you visit, and which websites you go to via our website.
- Data on which services or products you have looked at or searched for on our website.
- Data on length of visit to specific pages, and on how you made use of said pages.

When connecting our services to services from a third party, for example social media, we automatically collect the following data:

With your consent, we collect data when connecting our online services to services from a third party such as Facebook or Instagram. These are typically the same data as described above (name, email, IP address, location).

2.3 Data, which we receive from third parties

Occasionally, we collect personal data from third parties in context of the services we provide. We only collect these data with your consent, or in case it is authorised or required by law. With your consent, we may, for example, collect data from your social media accounts. You can choose which data you wish to share on your social media settings.

3. How do we use your personal data and for what purpose?

We register and use your personal data in order to be able to provide you with the services and products that you order from us, and in order to be able to provide you with the necessary support regarding these services and products. This means that we register and use your personal data for the following purposes:

- Administration of your customer affairs.
- Communication with you regarding products and services provided to you by us.
- Overview of usage of services and products.
- Administration of our service in addition to troubleshooting, control, and development of our network in order to provide you with the best possible service.
- We are legally obliged to do it, according to e.g.:
 - Tax law
 - Accounting law
 - Data protection law
- It is necessary for our legal interests. For example, in order to prevent abuse or loss, and/or for direct informational purposes.

We may also use certain personal data for our marketing, for example in order to provide you with more relevant and targeted information and marketing.

Lastly, we may also use personal data for statistical and analytical purposes, however, these are data, which are made anonymous after 6 months, so that the person in question cannot be identified.

4. Authorisation to process personal data

Authorisation is required for the processing of your personal data. For every which type of process, the authorisation will always be one of the following:

- That we have specifically been given your consent for the process
- The process is necessary in order to fulfil an agreement that you are part of (e.g. to provide a service).
- The process is necessary in order to comply with a legal obligation, which we are legally bound to.
- The process is necessary for us or a third party to legally pursue a special and justified interest, unless your interests or fundamental rights, which command personal data protection, take precedence.

5. For how long do we preserve your personal data?

We preserve your data for as long as necessary according to the purpose for which your data have been registered and used. Some of your data, such as your name, email etc., we preserve for as long as we are providing you with a service or product, while others, such as usage overview etc., are deleted after a short period of time.

Pursuant to accounting law, we are obliged to preserve accounting data for five years following the end of the accounting year, from which the data derive.

Marketing consent is preserved, so that it may be documented. It is preserved for as long as it is valid, and for two years following its last application.

As a telecommunications provider, in some instances we are obliged to preserve certain data regarding traffic on our network for research purposes etc., for the police. This is required by law under Section 9(1)(3) of the Faroese Law on Personal Data Protection (Lóg um

Persónsupplýsingar). We only collect and preserve such data in presence of a court order. Such data are preserved for as long as needed.

Data, which are relevant for potential legal claims, which become time-barred according to the relevant Statute of Limitations, are preserved for five years.

6. How – and with whom – do we share your personal data?

We share your personal data among the affiliate companies of the Føroya Tele association when necessary and for the aforementioned purposes. All the affiliate companies process the data according to this policy statement and the law.

We collaborate with external providers, who help us provide the services we offer. In some cases, we need to share personal data with these third parties, which may be domestic, i.e. Faroese, or foreign providers.

We share or forward your personal data, when:

- We need an external provider to provide you with a certain service.
- You request that we share your personal data with a third party according to this policy statement.
- You have given your consent for us to share your personal data.
- We are obliged or authorised by law to forward your personal data, for example in order to protect you, ourselves, or another party from injury, or when we are instructed by decree, court order, or by other legal means to forward the data.

Furthermore, we are required to forward certain data to possible number information databases etc., unless you have notified, that such data are not to be published.

When we share your personal data, we take necessary precautions to ensure that your rights are protected, and that a level of security is preserved during the data transfer. These precautions include, for example, third party contracts – especially when dealing with third parties outside of the Faroe Islands and the EU.

We will never sell your personal data to a third party without your explicit consent.

7. Your rights

Access to your personal data

The purpose of this Personal Data Policy is to explain to you how we process your personal data, and to provide you with information on and access to said process, as we are required to by law.

In case you need further information or access, you may gain access to your specific personal data, which we have registered and use, including information on where these data originate and the purpose of their use. You may be informed of how long we preserve your data, and of who receives your data. Your right to access may, however, be limited by law or reduced to the extent that your access infringes upon the rights of others.

The right to object

You have the right to object the process of your personal data. If the objection is upheld, we will cease all processing of the personal data in question.

The right to request a correction, deletion, or closure

You may request to have personal data corrected, deleted, or closed, if the data are incorrect, misleading, or processed unlawfully.

Withdrawal of consent

You may withdraw a consent, previously given to us, at any time. Please note, that in case you withdraw a consent, we may not be able to provide you with a certain service.

Please note, that we will continue using your personal data, for example in order to fulfil an agreement that we have with you, or in case we have the legal right to do so.

8. Contact and complaint options

You are always welcome to contact us in case you have any questions regarding your rights and/or our registration and usage of your personal data. You may contact us here:

FT Samskifti pf.
Klingran 5
PO Box 27
110 Tórshavn

Tel.: +298 303030

Email: dpo@ft.fo

If you wish to file a complaint regarding the process of your personal data, please address your complaint to the Data Protection Authority of the Faroe Islands (Dátueftirlitið):

Dátueftirlitið

PO Box 300

Tinganes

110 Tórshavn

Tel.: +298 309100

Email: dat@dat.fo

9. Policy changes

This Personal Data Policy is valid from 1 July 2020. We update our policy as needed and publish all changes on our website. By continuing your use of our services, you agree to this policy.

If we deem it necessary, or in case of comprehensive changes to this policy, we may send you an email or text message to inform you of the policy update.

In case you wish to cancel certain services as a result of comprehensive changes to this policy, you have 30 days following the announcement of the policy changes to cancel the services free of charge. If you do not convey a written cancellation within 30 days, the changes will be considered accepted.