

KPN Privacy Statement

April 2020

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 believe that it is important to ensure that our services are personal, simple and reliable. Accordingly, we are always searching for ways to improve our services and to tailor them as much as possible to your personal needs.

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 (e.g. about a breakdown) 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 Compleet. 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?

All companies that are part of the KPN group have adopted principally the same privacy policy. This means that you always know where you stand.

The party responsible for processing your data is the company with which you enter into a contract to supply the service you are using. For example, if you are purchasing a service from KPN B.V, then the party responsible for processing your data is **KPN B.V., Wilhelminakade 123, Rotterdam.**

2 SUMMARY OF THE KEY PROCESSING OPERATIONS

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 – e.g. 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 as required by the tax authorities
- Legitimate interest, such as for improving services, providing information about the use of the service, trend analysis, and marketing and sales

Approval –for example, for personalized marketing and sales;

For what purpose ►		Service	Network planning / administration / security	Complying with statutory obligations	To improve service, provide information about using the service, trend analysis	Marketing and sales	Supply to third parties for marketing purposes
▼What							
Telephony	<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 (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>Usage 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 (Volume 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 programs	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	yes, for cookies 'limited' or 'optimal'	yes, for cookies 'limited' or 'optimal', unless you make an objection	no
	<u>Data that you provide yourself</u>	yes	yes	n/a	yes, unless objection	yes, unless objection	no

	Link to your contact and usage data	yes, for cookies 'optimal'	yes, for cookies 'optimal'	yes, for cookies 'optimal'	yes for cookies 'optimal'	yes for cookies 'optimal', unless you make an objection	no
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3 MAKING CALLS WITH KPN

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 will also make these recordings/transcripts to make a record of your wish to change or terminate the services we supply to you (where relevant), and which ensure we comply with our statutory obligation.

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, and to deal with invoice queries, fault reports, or complaints. Unless we process your data, we cannot supply you with our services.

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. 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.

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 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, please 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 therefore requires the following information about you, to be supplied either by yourself 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 whether your bank account is active)
- 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 the following 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 to check whether your bank account is active.

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 of 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
- c. The result of the Telecom Income and Liabilities 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 Liabilities 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 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](#).

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

3.2.4 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.

3.2.5 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.

3.2.6 Marketing and sales activities, supply to third parties

KPN processes your personal and usage data for marketing and sales activities (even after termination of the contract) 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. We make these offers 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, telephone, SMS or e-mail. You can indicate this separately. Read chapter 12.3 elsewhere in this privacy statement for more information. We may also use your consumption data for our marketing and sales activities, but only if you have given your consent.

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. This information cannot be traced back to you personally in any way. Your identity will always remain a secret.

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.

3.2.7 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.

3.2.8 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](#)'.

3.2.9 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.

3.2.10 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.

3.2.11 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.

3.3 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.

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 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.

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)

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, giro or 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, time, and duration of the internet session, 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 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 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.

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, 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, please 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 network 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 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 after termination of the contract) for the benefit of KPN's own services, unless you have notified us that you object to this. We may also use 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 purpose.

Your data is processed by KPN for the purposes of making offers. We make these offers 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, telephone, SMS or e-mail. You can indicate this separately. Read chapter 12.3 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 activities and will only happen in an anonymized and aggregated form. This information cannot be traced back to you personally in any way. Your identity will always remain a secret.

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. 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 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 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

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, giro or 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 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

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.

Méer TV

Do you subscribe to 'Méer 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 aforesaid data, such as your TAN code, the number of your TV receiver, TV of 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 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.

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 item. 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 contact data for marketing and sales activities (even after termination of the contract). But not just for those reasons. We also process your personal data to be able to inform you about options for using the products and services you purchase from us, unless you have notified us that you object. Your data is processed by KPN for the purposes of making offers by letter, telephone or digitally (e.g. via SMS or e-mail), unless you have notified us that you object to being contacted by letter, telephone, SMS or e-mail. You can indicate this separately. Further information is contained in Chapter 11.3 of this Privacy Statement.

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.

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 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 OFFERS AND TARGETED ADVERTISING

KPN wants to make your TV experience more relevant through personal offers and targeted advertising. You have to give explicit permission for this.

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). For targeted advertising this data 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. 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 services to customers are not shared with third parties. For targeted advertising customers are classified in a profile group (e.g. household with sports fans). Only the profile groups are shared with advertisers so that they can offer advertisements specifically for a profile group instead of the traditional commercial breaks.

After giving your permission for the use of your data for these purposes you can also withdraw it at any time.

6 KPN WEBSITES

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), you must sign in with a username and password.

6.1.2 Cookies

KPN websites use cookies 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 ([link](#)).

By accepting cookies you can choose between three settings: 'minimal', 'limited' and 'optimal'. If you click on 'cookies accepteren' then you have selected 'optimal'. Would you like to change your setting? You can do this by clicking on the link 'your settings' and entering your choice there.

If you choose 'minimal', only functional and statistical cookies will be sent. These cookies ensure that our websites function well and that we can measure the use of our websites and quickly discover any problems.

If you choose 'limited', 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 can use the information we gather through these social media and advertising cookies to draw up anonymized statistics and data combinations. We use this anonymized, statistical information to show content you find interesting.

If you choose 'optimal', we send the aforesaid cookies. We combine the data collated via these cookies with your contact and usage data, which we have because you are one of our customers. This way we can improve our websites and our services, and we are able to send you targeted advertising and offers on our websites and on social media.

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 placed and which parties we allow on our website: this information can be found on our cookie page.

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. If we can find out, for example, whether users of our websites then get in contact with our customer service about a certain subject, 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 'optimal' setting.

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 'optimal' 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.

6.3 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 SMARTLIFE

7.1 WHICH OF YOUR DATA DO WE PROCESS?

7.1.1 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 may include 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, what peripheral devices you buy from us, where these peripheral devices are installed in your premises, and the data of your designated contact persons. We always process the data, no matter how you contact us. Whether it is 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 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'.

7.1.2 Use of the service

If you use KPN Smartlife, KPN will process data connected with your usage because we need it to provide the service. Your data that we, or one of our associated third parties, processes varies according to the service.

If you use KPN Smartlife Veilig, we will store the alerts we receive and the messages that we have sent to you or to your designated contact persons. We also record our telephone conversations following a message from you or your contact persons or if we have sent such a message ourselves.

If you choose to install a camera along with Smartlife Veilig, camera images will be stored in your own domain. We have no access to camera images that are stored in your domain, unless you yourself give us access to these images, after you have sent a message for example.

We call all the data referred to above 'usage data'.

To supply Smartlife Comfort we use the services of Plugwise. The data concerning your use of Smartlife Comfort is not processed by KPN but by Plugwise. Plugwise is therefore responsible for the processing of this data. You can obtain more information about which of your data Plugwise processes at www.plugwise.nl/privacy-beleid.

7.2 WHAT DO WE DO WITH YOUR DATA?

7.2.1 Service

The first reason for KPN to process your data is to be able to supply you with our services. We need your contact details for example to deal with requests. To be able to send you your invoice, we need to process not only your contact details but also the data concerning your use of our service and the peripheral devices you have. Certain usage data, such as product type and firmware versions, needs to be processed to prevent any faults and to be able to deal with fault reports.

7.2.2 Supply to third parties in the context of claims for loss, dealing with criminal offences

For the purposes of Smartlife Veilig, KPN can forward your data to the police, judicial system, or insurance companies. We do so only if this is necessary for resolving claims for loss or to track down perpetrators of a criminal offence.

7.2.3 Analysis, direct marketing and sales

KPN processes your contact details and usage data to improve our services, to inform you about options available to you and how you can make optimum use of the products and services you purchase from us. We can also use this data to send you targeted offers, unless you have objected to this. The data of your designated contact persons will be used by us only for the purposes of performing the Contract.

7.2.4 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.

7.3 FOR HOW LONG DO WE KEEP YOUR DATA?

We do not keep your data any longer than necessary in order to perform the Contract. We keep audio recordings for a maximum period of one month, unless in any specific case a longer period is required, for example in the context of an ongoing investigation or ongoing judicial or other proceedings.

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 store alerts for a maximum period of 62 days.

7.4 WHAT DO WE DO WITH YOUR DATA WHEN THE PERIOD FOR KEEPING IT 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.

8 KPN APPS

KPN supplies a range of apps. Which of your data we process for the purposes of the app, why we process it, and how long we store this data varies per app. During the process of installing the app, we tell you about the data processed in that app and what choices are available to you in this regard.

Some apps gather location data needed to transport your telephone and data traffic over our network. But for certain apps it may be necessary to process more detailed GPS data. Examples include a function to search for a location in your neighborhood. If one of our apps wants to process detailed location data, the app will inform you of this and indicate the choices available to you.

9 IN OUR STORES

To protect our employees, customers, and property we have installed video cameras in our shops. These cameras are very visibly positioned in our stores. In addition, you are given written warning of video camera surveillance.

10 HOW IS YOUR DATA SHARED WITHIN KPN

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 'optimal', 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.

KPN Compleet

There may be benefits available to you if you buy several products or services from KPN. We will be happy to inform you of these benefits. An example of this is KPN Compleet. KPN Compleet offers you certain benefits, such as a discount, extra free MBs and extra free TV channels, if at your home address you purchase one or more KPN Mobile subscriptions plus a subscription for internet or Alles-in-1 voor thuis. You can take advantage of these benefits even if not all of the KPN subscriptions registered to your home address are in the same name. To check if your household qualifies for KPN Compleet, we combine the data we have regarding the services used at your address. Your mobile number and the data concerning your use of the services you purchase from us will not be disclosed to persons you share a house with. If you do not wish your 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](#).

Solcon Compleet

There may be benefits available to you if you buy products or services from both Solcon and KPN. An example of this is Solcon Compleet. You can ask us to check whether you are eligible for Solcon Compleet. We will then combine the data about you held by Solcon with the data that we hold regarding which of our services you use. This data is used only to provide you with a discount for Solcon Compleet.

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.

11 SHARING YOUR DATA WITH THIRD PARTIES

11.1 WHAT WE DO NOT DO

11.1.1 Selling your data to third parties for the purposes of marketing, sales, or other commercial activities

KPN does not sell your data to third parties for marketing, sales, and 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 that there is no way the data can be traced back to any individual. Your identity continues to be unknown.

11.2 WHAT WE WILL DO

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

KPN engages third parties for specific network services, delivering our products and answering customer questions. 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.

11.2.2 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.

11.2.3 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, a criminal investigation, or the supply of information to copyright owners such as in the context of a judicial investigation into illegal downloading.

11.2.4 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.

11.2.5 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.

11.2.6 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.

11.2.7 Providing data, anonymized or not, to television content providers and advertisers

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.

Customers who have opted for targeted advertising are classified in a profile group. A profile group is composed of at least 100 persons. KPN shares the names of the profile groups with advertisers so that they can offer relevant advertising to the profile group. KPN then draws up an aggregated report which states how often certain advertisements have been shown. The aggregated reports do not contain any identifying data. KPN never shares personal data with advertisers.

11.2.8 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. Look on www.preventel.nl for more information.

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 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, please click [here](#).

If you wish to file an objection or require information about the way you have been included, you can contact Experian via this website www.experian.nl. Or you can [contact](#) us via our KPN Customer Relations department.

11.2.9 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.

12 YOUR RIGHTS (INSPECTION, CORRECTION, OBJECTION)

12.1 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.

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 give you a written reply within four weeks.

12.2 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.

12.3 RIGHT TO OBJECT, PERMISSION TO PROCESS YOUR DATA

12.3.1 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'.

12.3.2 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 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'.

12.3.3 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.

12.3.4 Objection to being approached

You can object to being approached 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 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

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. Would you prefer to contact us? You will find how to do so under the section headed '[Contact](#)'.

You can also prevent KPN from approaching you by e-mail or SMS for commercial purposes by following the instructions given in the e-mail or SMS messages that you receive. You can prevent approaches by telephone for commercial purposes by using the options menu of the 'Bel-me-niet Register' after receiving a call from KPN. At the end of the call, you can indicate that you no longer wish to be called by KPN. (Note: just registering in the Bel-me-niet Register does not automatically mean that you cannot be called by KPN in the future. You need to stipulate this separately in the options menu.)

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.

12.3.5 Bel-me-niet Register

If you do not wish to be approached anymore by telephone by parties other than KPN, you can register your telephone number in the Bel-me-niet Register. Once your number is registered in the Bel-me-niet Register, companies that you are not a customer of can no longer call you on that number. Further information about the Bel-me-niet Register is available at www.bel-me-niet.nl. As a customer of KPN, even if you have registered your number in the Bel-me-niet Register, you can still be called by KPN. Do you no longer wish to be called by KPN further? You can exercise the option of objecting to KPN about the use of your data to contact you for commercial purposes.

12.4 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.

12.5 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.

13 CONTACT

	Write to	Call or send SMS to Customer Service, free of charge, available 24/7	On our website
Right to inspection, correction, erasure and data portability	KPN Klantreacties (quoting: 'Rechten AVG') P.O. Box 58800 1040 JA Amsterdam (Netherlands) rechtenavg@kpn.com For verification purposes, add your name, address, fixed and/or mobile phone number and a blocked copy of your identity document to the request.		
Objection to the use of your data for analyses, marketing			www.kpn.com/uwgegevens

Objection to being approached in writing	KPN (quoting: 'AVG') PO Box 2547 3500 GM Utrecht (Netherlands)		www.kpn.com/uwgegevens
Objection to being approached by e-mail/SMS	Call 08000402 for fixed telephony Call 08000105 for mobile telephony	If you are a business customer, SMS 'STOP' to 1683	www.kpn.com/uwgegevens
Objection to being approached by telephone		Call 0800- 0402 for fixed telephony Call 0800- 0105 for mobile telephony	www.kpn.com/uwgegevens
Correcting a BKR registration	KPN Risk Control P.O. Box 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	
Requesting previous version of Privacy Statement	KPN Customer Reactions (quoting: 'request for previous privacy statement') P.O. Box 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) P.O. Box 13500 9700 EG Groningen		https://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:HR:2016:236
Data Protection Officer	Mr J. Jongenelen privacyofficer@kpn.nl		

