

# Privacy policy – Magenta Moments

(hereinafter: Policy)

Hrvatski Telekom attaches particular importance to personal data protection and privacy of its customers in line with applicable regulations and best European practices. The processing of personal data in connection with the use of the Moj Telekom App is described in the *Personal Data Processing Information – Moj Telekom App*, which is located within the application. The handling of personal data in relation to the Magenta Moments loyalty program (hereinafter: Program) is described below.

## 1. What data is collected, how is it used and how long is it stored?

- When participating in the Program, the members are entitled to offers, benefits and experiences from Hrvatski Telekom and partners participating in Program through the Magenta Moments section of the Moj Telekom App. In order to be able to show these offers to you, you need to activate this feature and accept the Terms and Conditions of the Program (Article 6, para. 1, point b) GDPR).
- Program offers and benefits are provided to you based on the data you have provided in order to use Program, data you have generated through the activities in Program, data you have generated through the usage of the Moj Telekom App (including services and pages which you used or displayed). You can choose to make your experience with Magenta Moments more personal by adding your nickname, your lifestyle, interests, age, gender, location. Providing any of this information is voluntary. By knowing more about you and your preference we can offer you more tailored offers, benefits, games or other activities which will improve your experience in the Program.
- Besides your Program experience, we can also use the Magenta Moments section to display you other offers relevant to you based on the marketing consents you have given when ordering other services or products from Hrvatski Telekom. These offers are not linked with your experience in the Program, we will display them only if you have provided your respective marketing consent previously or if we have relevant legitimate interest. If you do not wish to receive those offers, equally in Magenta Moments section, you can always withdraw your marketing consents in the consent management section in Moj Telekom App or via customer service channels of Hrvatski Telekom. Withdrawal of any of the marketing consents will not disturb you in using and benefiting from the Program.
- Your data is processed for the purposes of the Program until you are a member of the Program. You can terminate your membership in Program at any time by deleting your Magenta Moments account in the Moj Telekom App. Deleting the Moj Telekom App entirely also terminates your Magenta Moments membership. However, your personal information in the Program can be changed, updated or deleted at any time without the need to delete the entire account. In case you delete the Moj Telekom App, you will be able to come back within 12 months to your account settings and continue your Magenta Moments experience. If you delete the Moj Telekom App or your Magenta Moments account, your data collected during participation in the Program will be stored for 12 months from the termination of your participation in the Program.

## 2. Does Magenta Moments send push notifications?

Push notifications are messages that are sent to your end device and displayed there in a prioritized manner. By enabling push notifications for the Program, you may be notified on relevant Program communication such as but not limited to: Welcome - onboarding, expiry of hearts, earning of hearts, expiry of vouchers, refund of hearts - in case of any failures of provisioning/tech failures, etc., bundled offers (e.g. when a Telekom product is purchased that is linked to Magenta Moments), in case you are located within 1 Km radius of a geo-located voucher

that is in your wallet (already claimed), in case another member joins the Moments program, who was invited by you, communication related to games. You can disable the receipt of push notifications at any time in the settings of your device or via Moj Telekom App.

### 3. Data collection and tracking on third-party websites

#### Affiliate networks

Magenta Moments provides special discounted offers through our affiliate networks. These offers are always marked accordingly. The offer contains an affiliate link, e.g. in the form of a cookie with a special code that uniquely identifies the offer and the affiliate (partner) with the merchant. This enables the merchant to recognize who referred the customer to its online store and which offer the customer chose. The dedicated discount is awarded only if you finalize the transaction through the link provided in the Magenta Moments.

By clicking on the offer, you will be redirected to the third-party website over which we have no influence. Please therefore read the terms of use and the privacy information on these websites for more detailed information concerning the processing of personal data on these websites.

Those are the affiliate networks that we cooperate with:

Provider	Purpose	Storage period	Country
<a href="#">Tradedoubler</a>	Affiliate marketing on offers provided in Magenta Moments; Legal base is Art. 6 para. 1b GDPR.	Storage periods are defined by the partner company that provides the offer	Sweden
<a href="#">Partnerize</a>	Affiliate marketing on offers provided in Magenta Moments; Legal base is Art. 6 para. 1b GDPR.	Storage periods are defined by the partner company that provides the offer	United Kingdom

### 4. Who is responsible for data processing? Who do I contact if I have questions regarding data protection?

Hrvatski Telekom is responsible for data processing as data controller. If you have any questions regarding this Policy or handling your personal data in general, please contact our Data Protection Officer (e-mail: [osobni.podaci@t.ht.hr](mailto:osobni.podaci@t.ht.hr)) or our Customer Service.

### 5. What rights do I have?

You have a right:

- to request **information** on the categories of data processed, the purposes of processing, any recipients of the data, or the planned storage period (Art. 15 GDPR);
- to demand the **correction** or completion of incorrect or incomplete data (Art. 16 GDPR);
- to **revoke** given consent, for a processing that is carried out based on that consent, at any time with effect for the future (Art. 7 para. 3 GDPR);

- d. in certain cases, within the framework of Art. 17 GDPR, to demand the **deletion** of data - in particular, insofar as the data are no longer required for the intended purpose or is processed unlawfully, or you have revoked your consent in accordance with (c) above or declared an objection in accordance with (d) above;
  - e. under certain conditions, to demand the **restriction** of data, insofar as deletion is not possible or the obligation to delete is disputed (Art. 18 GDPR);
  - f. to **data portability**, i.e. you can receive your data that you have provided to us in a conventional machine-readable format, such as CSV, and transmit it to others if necessary (Art. 20 GDPR);
  - g. to issue a complaint to the competent **supervisory authority** (Croatian Personal Data Protection Agency).
6. To whom does Hrvatski Telekom pass my data?
  - a) To data **processors**, i.e., companies that we commission with the processing of data within the scope provided by law, Art. 28 GDPR (service providers, vicarious agents). Telekom remains responsible for the protection of your data even in this case. For provision of the Program, we use the processors:
    - Loyalty Juggernaut, Inc. (2100 Geng Rd Suite 210, Palo Alto, California 94303, US) for the purposes of providing personalized offers and
    - Deutsche Telekom Digital Labs Private Limited (15th Floor, DLF Building Number 9B, DLF Cyber City, DLF Phase 2, Sector 24, Gurugram, Haryana 122002, India) for the purposes of cloud-based data storage, processing and also IT support.
  - b) To **cooperation partners** who independently provide services for you. This is the case if you order services from such partners from us, if you consent to the involvement of the partner or if we involve the partner on the basis of legal permission.
  - c) **Due to legal obligation:** In certain cases, we are legally obligated to transmit certain data to the requesting government agency.
7. Where is my data processed?

Your data is processed in European Union, the US and India. Processing of your data takes place in countries outside the European Union (in so-called third countries) but only, insofar as it is necessary for our provision of services to you (Art. 49 para. 1b GDPR).

Furthermore, your data will be processed in third countries only when certain measures ensure that an adequate level of data protection exists (e.g. adequacy decision of the EU Commission or so-called suitable guarantees, including Standard Contractual Clauses Art. 46 GDPR.)
8. Changes of this Policy

The data controller is entitled to unilaterally modify this Policy with prior notification to the data subjects.

This Policy shall enter into force from the day of its publication.