

Privacy policy – Magenta Moments

The protection of your personal data has a high priority for Hrvatski Telekom d.d.. It is important to us to inform you about what personal data is collected, how it is used and what rights you have in this regard.

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

- When participating in the Magenta Moments loyalty program hereinafter referred to as the „Magenta Moments”, the Magenta Moments members are entitled to offers, benefits and experiences from Telekom and other providers participating in Magenta Moments through the Magenta Moments section of the Moj Telekom App. 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).
- We want Magenta Moments' offers and benefits to meet the preferences and expectations of every customer. To achieve this we will use data generated through the activities in Magenta Moments (i.e. hearts collected or redeemed, offers liked or disliked, offers finalized or abandoned), data generated through the usage of the Moj Telekom App (including services and pages used or displayed) and data you have provided in order to use Magenta Moments (such as age or interest). You can choose to make your experience with Magenta Moments more personal by adding your nickname, your lifestyle, interests, age, gender, location. 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 Magenta Moments. Providing this information is voluntary, you may choose not to give any additional information about yourself, in that case you will still receive offers and benefits, based on our assumptions drawn from preferences of similar customers groups behavior, however, they may not be so accurate for you.
- On top of/Besides your Magenta Moments 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 d.d. and/or (if applicable) legitimate interest used for marketing of Hrvatski Telekom d.d. products and services. These offers are not linked with your experience in Magenta Moments, we will display them only if you have provided your respective marketing consent, and/or (if applicable) not opposed to the processing happening based on legitimate interest, previously. 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 [in Moj Telekom app following next steps; Settings, Service Management-Notifications, Consent] or oppose to the legitimate interest [email: osobni.podaci@t.ht.hr]. Withdrawal of any of the marketing consents or making an opposition will not stop/disturb you in using and benefiting from Magenta Moments.
- Your data is processed for the purposes of the Magenta Moments until you are a member of the Magenta Moments. You can terminate your membership in Magenta Moments at any time by deleting your Magenta Moments account in the Moj Telekom App. However, your personal information in Magenta Moments 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

collected during participation in the Program will be stored for 12 months from the termination of your participation in the Program.

2. Partner Collaboration

Throughout Magenta Moments Hrvatski Telekom d.d. collaborates with partners providing various services such as gift cards and can be further extended. Those partner services are rendered and delivered to you exclusively by that partner subject to its terms and conditions which are presented to you while entering/registering to Magenta Moments. While you can access partner services through Magenta Moments all and any data you provide while purchasing a partner service (or interacting with the partner service) is provided directly to the partner without involvement of Hrvatski Telekom d.d.. Magenta Moments does not collect, store nor in other way processes data that is required by the partner to deliver its service. For the delivery of the service (including payments and notification on realization of the transaction/purchase) as well as for handling any questions or complaints in relation to the service our partners remain independent controllers, solely liable for the processing of your data pursuant to the partner's privacy policy. If you have a query about partner services and you contact Hrvatski Telekom d.d) directly with such a query, Hrvatski Telekom d.d. may, as part of its own independent procedures and at your request, assist you by forwarding your query to our partner and/or informing you of the status of the ongoing query you have made with our partner.

For gift card services, Hrvatski Telekom d.d. collaborates with Nuclei CDNA Technologies Private Limited ("Nuclei", Sobha Arena The Park, F1-4141, Thalaghattapura PO, Kanakapura Main Road, Uttarahalli Hobli, Bangalore, Karnataka, 560062) as partner.

Hrvatski Telekom d.d. and partner act as joint controllers (Art. 26 GDPR) in the scope of Magenta Moments transaction such as the retrieval, accumulation, redemption, use or, display of Magenta Moments transactions and assessing purchase behavior including tracking of a user behavior and sharing such information between Hrvatski Telekom d.d. and the Partner to enhance user experience in Magenta Moments - those are activities for which Hrvatski Telekom d.d. and the Partner jointly determine the purposes and means in accordance with Art. 26 GDPR ('Joint-controllers'). With respect to the data subject rights listed under Point 7 below, based on the arrangement between the controllers, each controller handles such request within the scope of its respective processing activities. You may exercise your rights listed under Point 7 in respect of and against each of the controllers.

3. 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 Magenta Moments, 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 Hrvatski Telekom d.d. 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. We currently deliver push notifications without engaging external processors for this purpose. If in

the future we engage processors, they will process personal data on our documented instructions, under contract compliant with Article 28 GDPR, with appropriate safeguards

Partners of Magenta Moments can also send you push notification regarding realization of their respective service. Those notification send independently form Magenta Moments notifications described above and Hrvatski Telekom d.d.is not responsible for their content nor frequency.

4. Data collection and tracking on third-party websites

1) 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 source 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
Tradedoubler	Affiliate marketing on offers provided in Magenta Moments; Legal base is Art. 6 para. 1b GDPR.	Storage periods are defined by the company that provides the offer	Sweden
Partnerize	Affiliate marketing on offers provided in Magenta Moments; Legal base is Art. 6 para. 1b GDPR.	Storage periods are defined by the company that provides the offer	United Kingdom

5. Where can I find the information important to me?

This privacy policy provides an overview of the points that apply to Telekom's processing of your data in Magenta Moments Information regarding the processing of personal data in

connection with the use of Moj Telekom App is available at <https://www.hrvatskitelekom.hr/pravne-napomene/uvjeti-koristenja> . Information on marketing consents given to Hrvatski Telekom d.d. is available here <https://www.hrvatskitelekom.hr/pravne-napomene/uvjeti-koristenja> .

6. Who is responsible for data processing? Who do I contact if I have questions about the data privacy policy at Telekom?

Hrvatski Telekom d.d. is responsible for data. If you have any questions, please contact our Data Protection Officer, Radnička cesta 21, Zagreb (e-mail: osobni.podaci@t.ht.hr) or our Customer Service.

7. What rights do I have?

You have a right,

- a. 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);
- b. to demand the **correction** or completion of incorrect or incomplete data (Art. 16 GDPR);
- c. 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. to **object** to data processing that is to be carried out **based on** a legitimate interest for reasons arising from your particular situation (Art. 21 (1) GDPR);
- e. 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;
- f. 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);
- g. 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);
- h. to issue a complaint to the competent **supervisory authority** about the data processing: Croatian personal data protection agency, Ulica Metela Ožegovića 16, email: azop@azop.hr

8. To whom does Hrvatski Telekom pass my data?

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. We commission companies in the following areas in particular: IT, sales, marketing, finance, consulting, customer service, human resources, logistics, printing. For provision of Magenta Moments, 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.

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.

Due to legal obligation: In certain cases, we are legally obligated to transmit certain data to the requesting government agency.

9. Where is my data processed?

Your data is processed in Croatia, other European countries, 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).

Status of privacy policy 05.03.2026.