

TELENOR'S PRODUCT-SPECIFIC DATA PROCESSING TERMS FOR TRUETALK

1. Introduction

- 1.1 These product-specific data processing terms ("**Product-specific Data Processing Terms**") shall apply to the processing of personal data that Telenor A/S (company reg. no. 19433692, Frederikskaej 8, 2450 Copenhagen) ("**Data Processor**") is conducting on behalf of the Customer ("**Data Controller**") when delivering the product ("**TrueTalk**") in accordance with the agreement between the Data Controller and the Data Processor ("**Agreement for TrueTalk**¹").
- 1.2 These Product-specific Data Processing Terms are defined in accordance with Article 28(3) of the General Data Protection Regulation ("**GDPR**") and, together with Telenor's General Data Processing Terms, set forth the rights and obligations of the Data Controller and the Data Processor when processing personal data on behalf of the Data Controller in relation to the delivery of TrueTalk.
- 1.3 These Product-specific Data Processing Terms form an integral part of Telenor's General Data Processing Terms and apply from the effective date of these general data processing terms.

¹ The agreement may, among other things, be drawn up as a product agreement, a SKI agreement, terms and conditions, or another type of agreement. It depends on the specific type of agreement entered into between Telenor and the Customer.

Appendix A Information about the processing

The Data Processor delivers TrueTalk and the related services to the Data Controller, as per the Agreement for TrueTalk.

A.1. The purpose of the data processor's processing of personal data on behalf of the data controller is

The purposes of the Data Processor's processing of personal data on behalf of the Data Controller are to be able to provide and configure TrueTalk for the Data Controller and to support the Data Controller's use of the solution.

A.2. The data processor's processing of personal data on behalf of the data controller shall mainly pertain to (the nature of the processing)

The nature of the processing of personal data carried out by the Data Processor on behalf of the Data Controller primarily consists of delivering TrueTalk to the Data Controller, including technical configuration and maintenance of TrueTalk.

If the Data Controller also purchases Telenor's product OneSupport (Service by Telenor), which constitutes a separate service agreement, the nature of the processing may also consist of administration, further configuration and subsequent service of the solution.

A.3. The processing includes the following types of personal data about the data subjects

The solution is developed to include the processing of general personal data covered by Article 6 of the GDPR. The following types of general personal data will be processed in accordance with the Data Processor's provision of TrueTalk.

When creating the Data Controller's users in TrueTalk, the following personal data is processed:

- Name
- Email address
- Telephone number
- Title and department
- "About me"-information and photo uploaded by the user

During the users' onboarding flow, the following personal data is processed:

- Name
- Email address

- Language
- Enterprise
- User ID

During the Data Controller's use of TrueTalk and the Data Processor's potential administrator access, as described below in section C.1, the following personal data is processed:

- Name
- Email Address
- Telephone number
- Title and department
- Credentials
- Status of the user, including whether the user is free, busy or absent
- Timestamps
- Call history and call information, including the date and time of the call, the duration of the call, who answered a call, and who was being called
- Calendar entries, including absences and durations
- Username and password for the credential management solution
- App statistics in relation to the use of the solution, including number of logins and uptimes

TrueTalk is not designed for the purpose of processing special categories of personal data as defined in Article 9 of the GDPR (sensitive personal data).

A.4. Processing includes the following categories of data subjects

The Data Controller's users of TrueTalk

For individuals whose calls go through the Data Controller's TrueTalk, phone number and duration of the call will be processed. Publicly available contact information is presented in the Data Controller's TrueTalk during the call, but this contact information is not stored.

A.5. The data processor's processing of personal data on behalf of the data controller may commence after these data processing terms have entered into force. Processing has the following duration

The duration of the processing corresponds to the duration of the provision of the service. The processing is therefore not time-limited but continues until the Agreement for TrueTalk is terminated or cancelled by either party.

Appendix B Authorised sub-processors

B.1. Approved sub-processors

On commencement of these Product-specific Data Processing Terms, the Data Controller authorises the engagement of the following sub-processors:

NAME	ADDRESS	DESCRIPTION OF THE PROCESSING	PERSONAL DATA PROCESSED
SUB-PROCESSOR OF THE DATA PROCESSOR			
Gintel AS (company reg. no. 983 953 271)	Otto Nielsens Veg 12, 7052 Trondheim, Norway	Assists with support and debugging.	The sub-processor will not process personal data on a regular basis, but may, in the event of support and error correction/debugging, process the data listed in section A.3.
Userflow Inc.	548 Market St PMB 69598, San Francisco, CA 94104	Used to customize the Data Controller's onboarding flow.	Name, email address, language, company and user ID.
SUB-PROCESSOR'S SUB-PROCESSORS			
<u>Gintel AS' sub-data processor</u> Atlassian	Level 6, 341 George Street Sydney, NSW 2000, Australia	Provides a system for error reporting in which support tickets are stored.	The sub-processor does not have access to the information but provides an error reporting system in which the support tickets are stored. These support tickets may contain the personal data listed in A.3.

<u>Userflow Inc.'s sub-processor</u> Google	Mountain View, CA, USA	Google Cloud Platform	The sub-processor is the Cloud Service Provider for the data used in connection with the onboarding flow (name, email address, language, entity and user ID). The sub-processor is hosting the data.
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The Data Processor shall not be entitled – without the Data Controller's written authorisation – to engage a sub-processor for a different processing than the one which has been agreed upon or have another sub-processor perform the described processing.

B.2. Notice for objection to change in sub-processors

The Data Controller shall, within 10 days from the date of the Data Processor's notification of any planned changes regarding the addition or replacement of sub-processors, submit a written objection to the Data Processor regarding the sub-processor(s) in question.

If the Data Controller objects, the objection must include the specific reasons for the objection.

Appendix C Instruction pertaining to the use of personal data

C.1. The subject of/instruction for the processing

The Data Processor's processing of personal data on behalf of the Data Controller shall be carried out by the Data Processor performing the following:

The Data Processor provides TrueTalk to the Data Controller and assists with technical configuration of the solution. An interface is made available to the Data Controller in which the Data Controller can manage its own TrueTalk solution. See the Agreement for TrueTalk for a detailed description of the administration options in TrueTalk.

If the Data Controller also selects Telenor's product OneSupport (Service by Telenor), the Data Processor can assist with setting up users and provide ongoing service. Here, the Data Processor will have access to the Data Controller's interface at the same administration level as the Data Controller itself.

The Data Processor has access to the Data Controller's TrueTalk and the information contained therein during technical support, troubleshooting and debugging. In cases where the Data Processor cannot remedy the error, the sub-processor mentioned in section B.1 can assist with technical support.

The Data Controller has the option to activate Office 365 integration. If this integration is activated, the Data Controller allows a synchronization of its 1) Active Directory, 2) calendar information and/or 3) availability in Teams from the Data Controller's Microsoft services to the Data Controller's TrueTalk. During so, the Data Controller allows and instructs the Data Processor to process the data on behalf of the Data Controller.

The Data Processor provides a credential management solution through which the Data Controller's employees get access to TrueTalk.

The Data Processor is only a data processor for the processing of personal data falling within the scope of delivering the Data Controller's TrueTalk interface. Other processing of the Customer's telecommunications data processed as part of Telenor's transmission of communications in the network is not covered by the General Data Processing Terms or these Product-specific Data Processing Terms.

C.2. Security of processing

The level of security shall reflect the scope of the data processing and the fact that TrueTalk has been developed for the purpose of processing general (non-sensitive) personal data, as stated in Appendix A.

The Data Processor is entitled and obliged to decide which technical and organizational measures must be implemented to obtain the necessary level of security.

However, the Data Processor must – in all circumstances and as a minimum – implement the following measures, as agreed with the Data Controller:

The Data Processor must maintain access restrictions, meaning that the number of the Data Processor's employees with access to the personal data must be limited to what is necessary.

Access to the Data Controller's TrueTalk interface is role-based and requires two-factor authentication.

The communication between the Data Controller's TrueTalk interface and the Data Processor is encrypted.

The Data Processor must ensure sufficient network separation.

C.3. Assistance to the data controller

The Data Processor shall insofar as this is possible – within the scope and the extent of the assistance specified below – assist the Data Controller by implementing the following technical and organisational measures:

The Data Processor shall, as far as possible and to a reasonable extent, assist the Data Controller with available information for the purpose of the Data Controller's compliance with the rights of the data subjects.

Should the Data Processor be met with inquiries or requests from the data subjects, the Data Processor will forward these to the Data Controller.

The Data Processor assists, without undue delay, the Data Controller with information relevant to the Data Controller's reporting of personal data breaches in cases where the breach has occurred in relation to the Data Controller's TrueTalk.

C.4. Storage period/erasure procedures

The Data Controller and its users can delete or correct information about the user directly in the Data Controller's TrueTalk on an ongoing basis.

Call history is deleted after 30 days, unless the user has defined a different storage period in the solution.

A user profile is linked to a phone number. When a phone number is no longer used and it is removed from the solution, the user profile is deleted. If the Data Controller chooses to pass on the phone number to another user, it is the Data Controller's sole responsibility to delete the old user profile and link the phone number to a new profile.

When the Data Processor's provision of TrueTalk to the Data Controller ends, or when one or more subscriptions are terminated, the data related to the Data Controller's users is deleted.

C.5. Processing location

Processing of the personal data under these Product-specific Data Processing Terms cannot be performed at any other locations than the following without the Data Controller's prior written authorisation:

NAME	LOCATION FOR PROCESSING	TRANSFER BASIS
THE DATA PROCESSOR		
Telenor A/S (company reg. no. 19433692)	Denmark	N/A
SUB-PROCESSOR OF THE DATA PROCESSOR		
Gintel AS (company reg. no. 983 953 271)	Norway	N/A
Userflow	United States	GDPR Article 45 (Data Privacy Framework)
SUB-PROCESSOR'S SUB-PROCESSORS		
Atlassian	Germany Ireland	N/A
Google	United States	GDPR Article 45 (Data Privacy Framework)

C.6. Instruction on the transfer of personal data to third countries

If the Data Processor uses sub-processors in accordance with Appendix B and the use of these sub-processors requires transfer to third countries, the Data Processor must ensure a basis for transfer pursuant to Chapter 5 of the GDPR.

When the transfer of personal data takes place to countries where the European Commission has determined that the country provides an adequate level of protection ("secure third countries"), the legal basis for the transfer is Article 45 of the GDPR.

C.7. Procedures for the Data Controller's audits, including inspections, of the processing of personal data being performed by the Data Processor

The Data Controller may, once a year, conduct a written audit to ensure that the processing of personal data is carried out in accordance with the applicable data processing terms, GDPR and the Danish Data Protection Act.

C.8. Procedures for audits, including inspections, of the processing of personal data being performed by sub-processors

The Data Processor shall conduct audits of the sub-processor's processing of personal data and notify the Data Controller if the outcome of such audits gives rise to such notification. The audits may be written audits or review of third-party certifications and audit statements.

Physical inspections may be carried out at the request of the Data Controller. The Data Controller shall reimburse the Data Processor for all expenses related to the physical inspection, in particular the time spent by the Data Processor and the sub-processor.

Appendix D The parties' terms of agreement on other subjects

N/A