



C MORE SERVICE PRIVACY POLICY

This is how we use your data

We, Telia Finland Oyj (hereinafter referred to as “Telia”) and MTV Oy (hereinafter referred to as “MTV”), are joint data controllers when processing personal data in the C More service in accordance with this privacy policy. In this privacy policy, we tell you about the processing of personal data.

This privacy policy (hereinafter referred to as the “Privacy Policy”) for the C More service applies when you are a customer of the cmore.fi streaming service or have subscribed to the C More streaming service from Telia, and the service agreement is between you and Telia (hereinafter referred to as the “Service”).

This Privacy Policy does not apply to a C More service that you have subscribed to through your operator. As a customer logging in with operator-provided credentials and as a code customer of local operators, your contracting party is MTV Oy, and MTV’s privacy policy applies to the processing of personal data in the service.

Telia provides Services that are maintained and developed together with MTV. MTV is responsible for the content of the Services and provides and produces programmes available for viewing in the Services. The C More TV offered by Telia is a partially ad-funded product of the C More streaming service, which is available for sale exclusively to Telia’s subscription customers. MTV is responsible for advertising in C More.

MTV offers a parallel C More service, i.e., an ad-funded mtv service, the advertising of which is necessary for the provision and delivery of the service and for its funding model. In said advertising, the customer data of the Services and data pertaining to the use of the Services play a key role.

Depending on the purpose of processing, Telia and MTV may act as separate or joint controllers of customer data you provide to the Services and of personal data generated in connection with the use of the Service or otherwise collected. The roles of Telia and MTV for various purposes of processing are described in this Privacy Policy. You can always contact either company regardless of the situation if you have any questions about processing of personal data. The contact details can be found in section 2 of this Privacy Policy.

For more information about exercising your data protection rights, see section 9.

1. GENERAL

We at Telia and MTV are committed to complying with data protection legislation and processing your personal data (hereinafter referred to as “personal data” or “data”) in accordance with good data management and data processing practices. We are also committed to complying with the industry’s self-regulation, such as the code of conduct on direct marketing of the Data & Marketing Association of Finland

(“ASML”) and the Interactive Advertising Bureau’s (“IAB”) self-regulation guidelines for targeted online advertising.

Data protection legislation refers to data protection legislation in force, such as the General Data Protection Regulation of the European Union (2016/679) and the Data Protection Act (5 December 2018/1050). Terms related to data protection that are not defined in this Privacy Policy are interpreted in accordance with data protection legislation.

2. JOINT CONTROLLERS AND DATA PROTECTION OFFICERS

Telia Finland Oyj

Business ID: 1475607-9

Address: Pasilan asema-aukio 1, 00520 Helsinki

Contact details of the Data Protection Officer:

E-mail: tietosuoja-telia@teliacompany.com

MTV Oy

Business ID: 1093944-1

Address: Ilmalankatu 2, 00033 MTV

Contact details of the Data Protection Officer:

E-mail: tietosuojavastaava@mtv.fi

3. WHAT PERSONAL DATA DO WE PROCESS?

We obtain the personal data we process from you yourself, by collecting information about the use of the Services and your behaviour in various channels, and by obtaining information from external sources, such as cooperation partners or service providers, as well as other companies belonging to Telia Company (hereinafter referred to as “Telia companies”).

3.1. Information you provide yourself

C More

- Registration details: user ID*, password*
- E-mail address* (=user ID)
- Phone number*

- First name and last name*
- Payment card details (first 6 and last 4 digits of the card number and card validity period)*
- Billing and payment information accrued from payments
- Authorizations, consents and prohibitions (e.g., regarding direct electronic marketing)

The C More TV product

- Registration details: user ID*, password*
- E-mail address* (=user ID)
- First name and last name*
- Year of birth*
- Address*
- Postcode*
- Gender
- Phone number
- Authorizations, consents and prohibitions (e.g., regarding direct electronic marketing)
- Payment card details (first 6 and last 4 digits of the card number and card validity period)*
- Billing and payment information accrued from payments

*=Mandatory information. If you choose not to provide us with this information, we may not be able to provide our Services to you.

When you contact our customer service, participate in competitions or various surveys, provide feedback or comment on our Services websites, we also collect the following information about you:

- Contacts to our customer service
- Information on competitions
- Customer feedback
- The material you send for publication (photographs, letters to the editor and other writings)
- Comments and other user reactions in our Services

3.2. Technically collected data on the use of the Services

We collect information about the use of our Services, which of our Services are interesting to you and what kind of content you like to view, for example, on our website or in applications. We also collect information about the technical properties of the equipment you use in order to provide you with a good user experience. The collection of data is done using cookies (including similar web tracking technologies) or the user ID. With the information we collect, we can recommend programmes and content to you that we believe will interest you.

Cookies are also used to enable the functionality of the Services and analytics. Cookies make it easier for you to use our Services, for example, and the advertising you see better corresponds to your areas of interest.

More details about the use of cookies can be [found here](#).

You can log in to the C More service with your mtv service user ID and password. You do not need to subscribe to the Service to log in, but the content behind the login is limited. We collect information about logins and user actions even in this situation.

3.3. Information obtained from elsewhere

We may receive your personal data from other Telia companies (e.g., the mtv service). We may also combine your personal data between other Telia companies as described in this Privacy Policy.

We also obtain personal data from other external sources, such as private register services and registers maintained by the authorities. In addition, based on cookies, we combine segment-level information from our cooperation partners' registers within the legal conditions.

Below is a list of companies with which we co-operate and whose services help us improve the quality of the data we collect and, for example, create segments needed for advertising management.

We will update the list if necessary.

COMPANY

- Bisnode Finland Oy
- Digital and Population Data Services Agency
- Other Telia companies
- DMA Finland's (Data & Marketing Association of Finland) Robinson register

We use the following collaborative companies to measure and report visitor traffic on our sites and to monitor the quality of our Services and error management at a general level.

COMPANY

- Adform
- Adobe Systems Inc.
- Akamai
- Finnpanel (AudienceProject ApS)
- Google Analytics
- INVIDI Technologies Corporation
- Nice People at Work NPAW (Youbora)
- Sentry

3.4. Personal data and examples of data content

PERSONAL DATA AND EXAMPLES OF DATA CONTENT

- Registration details: user ID and password
- E-mail address
- First name and last name
- Date of birth
- Address
- Postcode
- Gender
- Phone number
- Payment card details (first 6 and last 4 digits of the card number and card validity period)
- Billing and payment information from payments, as well as information on various discount codes and their use
- Permits and prohibitions for customer communications and electronic marketing as well as other communication settings
- Customer service calls, e-mails, chat messages and communication with customer service in social media channels
- Competition responses
- Contact information you provide in connection with competitions
- Customer feedback and other contacts with our customer service and other correspondence with customers and any complaints
- Material submitted by the customer, intended for publication
- Comments and other reactions on the websites of our Services
- Programmes you add to your favourites
- Information about unfinished programmes
- Data collected on the basis of cookies and other online tracking technologies, such as IP address, browser type and pages visited and the duration of visits
- The devices you use and their technical properties
- Visits to and navigation in websites and viewing history
- Actions taken by the customer in the Services and their times
- Data received from MTV and other Telia companies, such as account and marketing information and information related to the products and services of other Telia companies and their use

4. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS YOUR DATA ARE PROCESSED

We process personal data for a variety of purposes, the most important of which are described below. All purposes of use can be found in section 4.4.

4.1. Provision of services and customer relationship management

We process your data to create a user account, produce the Services and ensure the functionality of the Services, and for placing any orders based on the agreement between you and Telia and its implementation.

4.2. Content personalization and product development

In order to improve the customer experience, with the information collect, we can recommend programmes and content to you that we believe will interest you. In addition, the information obtained from the use of the Services is used for the maintenance, development, and analytics of the Services as well as for business development. The processing of your data for these purposes is based on the customer relationship between us and the legitimate interest associated with it.

4.3. Personalization of the service, advertising and direct marketing

Your data may be used to personalize and target Telia companies' services and advertising.

The information you provide when ordering the C More TV product is used when creating audiences for MTV's advertiser customers. With ads, we can offer the C More TV product at a lower price than a standard C More subscription. The processing of your data for these purposes is based on the customer relationship between us and the legitimate interest associated with it, as well as a legitimate interest related to the business of a third party.

The personalization and targeting of advertising takes place mainly on the basis of the age and gender segment attached to the user ID, the postcode and cookies and data collected using similar web tracking technologies. Segments are created using the information you provide, refined data and usage history.

In addition, personal data is used for direct marketing, including electronic direct marketing, within the framework of the legislation and your consents, to market the products and services of Telia companies as well as our cooperation partners. The processing of personal data is based on our legitimate interest and on your consent to electronic direct marketing in accordance with the legal conditions.

4.4. All purposes of use

The list below provides all purposes of use of personal data. The uses are not in any particular order.

PURPOSE OF USE	Company/companies primarily processing personal data
Registering for the Service and using the Service, and delivering Services and products	Telia
Unique customer identification and authentication	Telia
Tracking the customer's order history and tax and accounting obligations	Telia
Changes to the customer's personal information	Telia
Customer communication and personalization of customer communication	Telia
Targeting of advertising and customer communications	Telia and MTV
Direct marketing, including electronic direct marketing and telemarketing, planning and measuring the effectiveness of advertising and marketing, and combining and updating personal data for direct marketing purposes	Telia and MTV
Targeting advertising and recommendation of programmes by age segment	Telia and MTV
Targeting advertising and recommendation of programmes by gender	Telia and MTV
Targeting advertising, customer events and competitions to a specific geographical area	Telia and MTV
The customer's option to choose what kind of communication and electronic direct marketing they want to receive and what not	Telia and MTV
Organization and participation of competitions and selection of winners (usually on a lottery basis)	Telia and MTV
Delivery of competition prizes	Telia and MTV
Customer service in multiple customer service channels	Telia

Enabling customer engagement	Telia and MTV
Customer's Service usage history: Analyzing the use and development of the Service and improving the customer experience	Telia and MTV
Making it easier to find and recommend programmes	Telia and MTV
Continue watching programmes at a later time	Telia and MTV
Personalizing the Service based on the customer's usage history	Telia and MTV
Analysis of service and the equipment pool, specifying new supported equipment, identification of technical errors and monitoring the quality of the Services, maintenance of information security, threat prevention and protection of continuity of the Services, e.g. through backups	Telia and MTV
Development and analytics of business, products and services, and production of information and statistics necessary for business planning	Telia and MTV
Internal and group reporting and other administrative measures	Telia and MTV
Management of legal obligations, such as accounting and statutory reporting and notification obligations	Telia
Prevention and investigation of abuse and fraud	Telia and MTV
Settling disputes and responding to and, as appropriate, taking and presenting legal actions and claims, including, where appropriate, participation in Consumer Disputes Board proceedings and court trials and similar legal proceedings	Telia and MTV

With regard to the use of the Services and the related rights and obligations, such as the monitoring of compliance with the terms of the contract, the basis of the processing of personal data is the contractual relationship and the implementation of the agreement. In addition, we process personal data on the basis of a legitimate interest, for example in relation to advertising and direct marketing and the related profiling, as well as for customer communications, as well as the development of services and products, reporting and analytics, and the prevention of abuse and for ensuring security. In addition, the processing of personal data is based on compliance with a legal obligation to the extent that personal data is processed in order to comply with legal obligations, such as statutory retention periods. With regard to electronic direct marketing,

the processing of personal data is based on the consent of the data subject in accordance with the legal conditions.

4.5. Processing of personal data between Telia companies

In addition to what is stated in this Privacy Policy, Telia companies may process, combine and cross-compile personal data between other Telia companies if there is a justified need for it, for example, to conduct and plan the companies' business, to comply with legal obligations and for other administrative purposes, and to create and develop products and services, to increase customer understanding, to provide and produce a service, for marketing and for other purposes that the companies concerned have reported that they process personal data for. Telia companies are responsible for the lawfulness of the processing of personal data and for informing data subjects and implementing their rights in accordance with the applicable privacy policies.

4.6. Joint controllership with Facebook

When we maintain fan and business pages on Facebook with Telia/MTV as the manager, Facebook and Telia/MTV are joint data controllers within the meaning of data protection legislation with regard to the personal data of visitors to that Facebook page, where applicable. Facebook and Telia/MTV are joint controllers, as applicable, also for Facebook's community-related services (such as Facebook's sharing feature, which can be used to share site content on social media).

Facebook processes personal data in accordance with its own privacy policies. More information is [available here](#). Facebook is primarily responsible for complying with the obligations of data protection legislation and for implementing the rights of the data subject in its service. Telia/MTV is responsible for complying with the obligations of data protection legislation and processes visitor data of fan and business sites in accordance with this Privacy Policy, for example for targeting advertising.

For more information on the processing of personal data by Facebook and the manager of the pages and on the division of responsibilities between joint data controllers, see the [Facebook data controller appendix and here](#).

Facebook's privacy settings can be managed on Facebook, in addition to which you can contact Facebook if you wish to exercise the rights of the data subject. You can find the contact details in Facebook's privacy policy, which is linked above. More information about the data subject's rights with regard to Telia/MTV can be found below in section 9 of this Privacy Policy.

5. HOW LONG DO WE STORE YOUR DATA?

We store personal data for as long as necessary to fulfil the purposes defined in this Privacy Policy, unless legislation, a reporting obligation or other legal obligation require that we retain personal data for longer. When data is no longer needed, it is deleted within a reasonable time.

Our main retention period policies are described below.

C More and the C More TV product:

As a general rule, we store the user's personal data for two years after the user has last used the Service or the subscription has been valid. If the user has not used the Service within two years and the subscription is not valid, we will delete the user account. However, we can retain the e-mail address and phone number associated with a C More account in order to enforce the terms of use and prevent abuse for up to two years from the closing of the account.

Customer satisfaction surveys, other surveys and marketing information:

For customer satisfaction surveys and other surveys, depending on the survey, the respondents' personal data will be deleted or anonymized no later than two years after the end of the calendar year in which the survey was conducted.

However, as an exception to the retention periods for service-specific retention periods, the personal data necessary for marketing is stored for as long as we target the data subject or the data subject is contacted regarding certain Services or products, and the data subject has not objected to the processing of personal data for direct marketing, or, if direct marketing is based on consent, withdrawn the consent given. Consents, prohibitions and restrictions on the processing of personal data will be maintained for as long as they remain in force.

Other retention periods and retention period criteria:

As an exception to the above-mentioned general rules, personal data may be stored for the necessary period of time if it is needed, for example, in connection with a complaint or similar matter or a trial. In addition, personal data may be stored in order to fulfil legal obligations. For example, we store all information about payment cases for six years in accordance with accounting and tax law requirements.

Further information:

Upon request, we will provide additional information on the retention periods and storage period criteria. See contact details in section 2.

6. TO WHOM IS YOUR DATA DISCLOSED OR TRANSFERRED?

We comply with data protection legislation when disclosing personal data and using data processors.

Personal data may be disclosed or transferred to Telia companies in accordance with the conditions of data protection legislation, where there is a legal ground for processing the disclosure or transfer. Telia companies may process personal data for the purposes specified in this Privacy Policy, including to market their products or services.

If Telia or MTV are involved in a merger, business acquisition or other business arrangement, we may need to disclose personal data to the parties involved.

Personal data may be disclosed to the authorities in situations required by law. In addition, personal data may need to be disclosed if we are involved in trials or similar legal proceedings.

We provide our partners with segment-level information for the targeting of digital advertising and information for marketing purposes. Our website and Services contain third-party cookies.

Please note that our website may also contain links to the services of our cooperation partners and other third parties. When these third parties act as controllers, that party's own privacy policy applies, and we are not responsible for their content or for the processing of personal data by these third parties. We recommend that you review the privacy policies of that site.

We use various external service providers for the production of our Services and the related processing of personal data, such as e-mail service providers, a payment card company, digital marketing service companies, customer relationship management service providers, an external customer service, data refinement companies, companies that carry out surveys on our assignment and companies offering various technical platforms, and other parties that are in the position of a personal data processor. The service providers process your personal data in the manner we specify to produce our Services. In addition, we have taken care of the agreements required by data protection legislation with these parties.

7. WILL YOUR DATA BE TRANSFERRED OUTSIDE THE EU OR EEA?

As a general rule, we process data within the European Union ("EU") and the European Economic Area ("EEA"), but it can also be processed outside the EU and EEA. If personal data is transferred outside the EU or EEA, we will ensure the lawfulness of the transfer of personal data by means of an appropriate safeguard mechanism, such as the European Commission's standard contractual clauses.

Upon request, we will provide additional information related to the transfer of personal data and the safeguard mechanisms used. You can contact our Data Protection Officers.

8. PROTECTION OF PERSONAL DATA

We adequately protect personal data through technical and organizational measures, including pseudonymization and encryption of personal data. We also strive to ensure the functionality of our systems during faults and the possibilities for data recovery.

Your data is processed only by people who have the right to process personal data, such as people working in customer service and other people processing the data because of their work duties.

Personal data is maintained on properly secured servers and services. These safeguards include access management, access control, firewalls and password protection. Only the necessary employees of Telia

companies and contracted service providers and others, as provided by law and separate provisions, have access to the data.

Through the Services, we report potential information security threats and possible data breaches directly to the authorities or the user in accordance with the applicable legislation. We may also temporarily close the Services in order to protect personal data.

9. YOUR RIGHTS

As a data subject, you have all the rights under data protection legislation. However, the application of your rights in each individual situation depends on the purpose and situation of the processing of personal data.

The right of access

Pursuant to data protection legislation, you have the right to receive confirmation of whether your personal data are being processed and, if they are processed, to gain access to the data and to receive the data specified in data protection legislation on the processing of personal data. In addition, you have the right to receive a copy of the personal data.

The right to rectify data and right to erasure of data

You have the right, subject to certain restrictions, to demand that incorrect, inaccurate or incomplete personal data be rectified. In addition, you have the right to demand the erasure of your personal data in accordance with the requirements of data protection legislation. At your request, we will delete personal data unless we are required by law to retain them, or any other exception under data protection legislation applies.

The right to restriction of processing

Pursuant to the conditions of data protection legislation, you have the right to request restrictions on the processing of personal data in certain situations.

The right to data portability

Pursuant to data protection legislation, you have the right to demand that your personal data be transferred to another controller. The right of transfer applies, as a general rule, to personal data that you have provided to us in a structured and machine-readable form, the processing of which is based on your consent or agreement, and the processing of which is carried out automatically.

The right to object to processing

Pursuant to the conditions of data protection legislation, you have the right to object to the processing of your personal data that takes place on the basis of legitimate interests, including profiling. We may refuse the request if the processing is necessary in order to implement mandatory and legitimate interests of Telia, MTV or a third party. However, you are always entitled to object to the processing of your personal data for direct marketing purposes and for profiling related to direct marketing.

The right to withdraw consent

If the processing of personal data is based on your consent, you have the right to revoke that consent.

Please note that withdrawal of consent has no effect on the processing of personal data done prior to the withdrawal.

In addition, you have the right to withdraw your consent to electronic direct marketing.

How can you exercise these rights?

You can check your personal data in C More's Omat tiedot section. There you can manage matters related to, for example, customer communication and electronic direct marketing consents, view personal data collected about you and delete your data from the Service. If you wish to exercise other rights of the data subject, please contact [C More customer service using the contact form](#).

If you have any other questions about the processing of your data, you can send your enquiries to tietosuoja-telia@teliacompany.com.

Your identity will be verified before processing the request. The request will be replied to within a reasonable time and, where possible, within one month of the request being made and the identity verified. If the request cannot be accepted, the refusal will be communicated separately.

Right to file a complaint with a supervisory authority

We hope that you will contact us if you have any questions regarding the processing of your personal data. If you are not satisfied with the answers you receive and consider that the processing of your personal data is in breach of data protection legislation, you may file a complaint with the competent data protection authority. You can find the contact details of the Finnish data protection authority [here](#).

10. CHANGES TO THE PRIVACY POLICY

We continuously develop the Service and our operations and can periodically amend this Privacy Policy. The changes may also be based on changes in data protection legislation. We therefore recommend that you regularly review the Privacy Policy to identify changes. The latest version is available on our website. We aim to notify you of material changes primarily by means of notices displayed in the Service and, if possible, also to the e-mail address obtained from the user, if necessary.

If there is a conflict between translations, the Finnish version shall prevail.

The Privacy Policy was published on 24 May 2021 and will enter into force on 1 July 2021.