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DATA PROTECTION POLICY

1. WHO WE ARE? WHAT SERVICES DO WE OFFER?

Telefónica International Wholesale Services II S.L.U. ("TIWS"), Spanish Company whose registered office is at Ronda de la Comunicación s/n, Building West 1, Floor 2, Madrid 28050 (Spain). We are part of the Telefónica Group, providing wholesale telecommunication services and providing telecommunication and value-added services to multinational corporate customers.



DPO:

The Data Protection Officer is the person in charge of guaranteeing the protection of your fundamental right to the protection of personal data within TIWS. To contact the Data Protection Officer, you can write to the following address: privacidad.businesssolutions@telefonica.com

2. WHAT IS OUR COMMITMENT IN TERMS OF DATA PROTECTION?

TIWS is committed to ensuring the adequate protection of personal data and compliance with relevant regulations, in particular the obligations and safeguards set out in Regulation (EU) 2016/679 ("GDPR").

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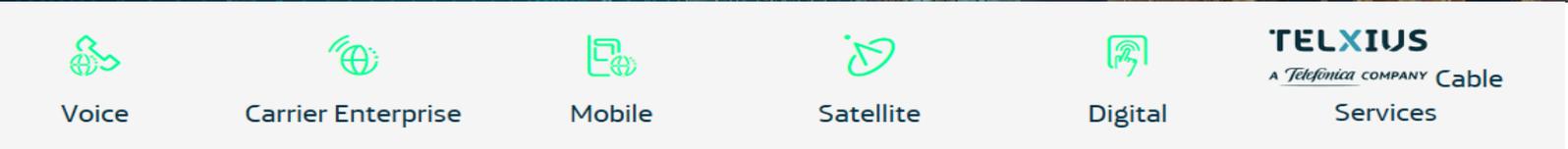
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TIWS is committed to ensuring the security, secret and confidentiality of its customers' data, communications and personal information. Therefore, as part of our commitment and in compliance with current legislation, we have adopted the most demanding and robust state of the art security measures and technical means to prevent their loss, misuse or access without your authorization, committing ourselves to keeping them secret and guaranteeing the duty to keep them safe by adopting all necessary and reasonable measures to prevent their alteration, loss and unauthorized access or processing, in accordance with the provisions of applicable legislation.

Likewise, TIWS facilitates the exercise of the rights of data subjects in accordance with the GDPR:

- **Access:** allows the data subject to obtain information on whether or not TIWS is processing personal data concerning him/her and, if so, the right to obtain information on the personal data being processed.
- **Rectification:** allows for the correction of errors and the modification of inaccurate or incomplete data.
- **Erasure:** allows data to be erased and not processed by TIWS, unless there is a legal obligation to retain them. For example, where personal data are no longer necessary for the purposes for which they were collected, the data subject may request that we delete such data without undue delay.
- **Restrict data processing:** under the conditions established by law, it allows the processing of data to be stopped, in such a way as to avoid future processing by TIWS, which will only keep them for the exercise or defence of claims.
- **Right to object:** in certain circumstances and for reasons related to their particular situation, data subjects may object to the processing of their data. TIWS will cease processing the data, except for compelling legitimate reasons, or the exercise or defence of any claims.



- **Portability:** it allows the data subject to receive the personal data concerning him or her, and be able to transmit those data to another controller in a structured, commonly used and machine-readable format.

TIWS adopts the necessary measures to facilitate the exercise of these rights, provided that TIWS has sufficient information to

enable it to identify the data subject for the proper and safe exercise of its rights.

Finally, we would like to remind you that the data subjects have the right to submit complaints with the national supervisory authority. To this effect, they must address the Spanish Data Protection Agency.

3. WHAT PERSONAL DATA DO WE PROCESS AND FOR WHAT PURPOSES?

TIWS processes personal data in its normal traffic for two types of purposes: those directly related to the communications provided to its customers and for the day-to-day management of its products and services with its customers.

3.1. FOR THE PURPOSE OF PROVIDING ELECTRONIC COMMUNICATIONS SERVICES TO OUR CORPORATE CLIENTS AND OTHER OPERATORS.

As a company dedicated to the provision of corporate and wholesale telecommunication services, we must process the data necessary to provide communications, receive or deliver them to their destination and manage their signalling. This data may be the origin and destination telephone numbers of the communication, whether is fixed, mobile or satellite, the identification data of the mobile cards

(IMSI), the data associated with the device, such as the IMEI or MAC address, the IP address, as well as the data relating to the communication, such as duration, minutes, volume of data transmitted, date and time of the communication, cell location data, as well as any other data required to carry out an electronic communication.

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TIWS does not offer services to individuals, only to legal entities or corporations, so we generally do not have access to information that allows us to directly determine the identity of natural persons using TIWS communications services. In any case TIWS will need to treat any personal data that may be necessary to process communications in accordance with applicable telecommunications regulations and in accordance with the legitimate interest of TIWS in providing the communications service, as well as that of its corporate customers and communications operators, in order for its communications to be properly processed.

The aforementioned data may also be processed for the following purposes:

- For **billing** customers for the communications they have contracted;
- For the **interconnection** of communications with other operators;
- For the control of **fraud**, of its own or of its clients;

- For the **security** of the connected networks and equipment, both from TIWS and its customers’;
- For the correct **sizing of the network** and the resources allocated to it;
- To ensure the correct **quality** of its services;
- In order to **anonymize** them in such a way that the data cannot be associated with a specific identified or identifiable natural person.

We will need to transfer personal data to other operators so that they can process the communication, for example, we will need to deliver personal data to the operator that terminates the call or to another operator that transports it internationally. This transfer may mean the international transfer of personal data for the sole and exclusive purpose of providing the communication.

As for the storage of personal data, the data will be kept for a period of 12 months, unless otherwise provided for by national applicable law.



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3.2. TO MAINTAIN TECHNICAL, COMMERCIAL OR LEGAL RELATIONSHIPS IN CONNECTION WITH THE PROVISION OF SERVICES COMMERCIALISED BY TIWS

In order to offer its services to current or potential corporate customers, or to deal with technical, operational and service configuration issues, or to send out surveys to evaluate the quality of services or any other type of information related to the provision of services to corporate customers, TIWS will need to process data on individuals. The data that TIWS will process will be those strictly necessary for the professional location such as name, address, e-mail address or telephone number. TIWS will not process such information for any purpose other than the relationship with the corporate client where the data subject provides its services.

TIWS will also process the data on behalf of its customers' representatives related to the contracts' signature for the purpose of the day-to-day management of the company's contracting.

In all these cases, the processing for the above-mentioned purposes is carried out on the basis of TIWS' legitimate

interest in offering its products and services to companies and for their ordinary technical, commercial and legal management.

In some cases, we may need to transfer the data to other companies of the Telefónica Group for administrative or commercial purposes in connection with the products and services marketed by the Telefónica Group to its corporate customers.

We will keep these data for as long as we maintain the business relationship with the company.



Individuals are able to exercise their rights by sending an e-mail to the following address, where they may oppose the processing of their data for this

purpose: privacidad.businesssolutions@telefonica.com



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3.3. INTERNATIONAL TRANSFERS

TIWS contracts the management of some of the functions necessary for the provision of its services to data processors located outside the EU. In such cases TIWS shall require the data processor to ensure an adequate level of protection of personal data.

4. WHAT ARE THE OBLIGATIONS FOR TIWS WHEN ACTING AS DATA PROCESSOR?

In addition to the services in which TIWS provides communications services, TIWS offers a number of value-added services to its corporate clients where it processes data on their behalf.

In such cases, TIWS guarantees its customers compliance with data protection applicable regulations and in particular the application of appropriate technical and organisational measures to ensure a level of security appropriate to the risk to privacy arising from the data processing and to ensure such compliance by its partners and subcontractors.

In order to give effect to these safeguards TIWS, as data processor, shall enter into a contractual agreement with its customers to fulfil its obligations in accordance with the GDPR. Customers can request through their commercial contact the model data processing agreement, suitable for contractually implementing the obligations, guarantees and commitments according to the GDPR.
