



## Service specific Privacy Notice – TDC Erhverv Data Services

When you use TDC Erhverv's services in the categories Fixed Broadband, Mobile Broadband, Data Services, M2M and LAN Network (collectively referred to as the "Services"), TDC Erhverv (Nuuday A/S), as an independent data controller, collects and processes a range of personal data about you.

TDC Erhverv is subject to several strict requirements under telecommunications legislation concerning the delivery of telecommunication services.<sup>1</sup>

This reduces customers' ability to issue instructions to such an extent that the relationship is not a data processor relationship, and no data processing agreement is required.

The position may be different for other services. In our Service Overview at [tdc.dk/vilkaar](https://tdc.dk/vilkaar), you will find an overview of all our services and information on whether a data processing agreement is required.

In this Privacy Notice, we describe the circumstances relating to our processing, use and disclosure of personal data solely in connection with the Services specified above.

TDC Erhverv's general Privacy Notice: [tdc.dk/da/persondatameddelelse-eng](https://tdc.dk/da/persondatameddelelse-eng)

### Types of personal data

When you use the Services, the following personal data is collected, verified or otherwise processed in our internal systems:

- Name
- Address

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<sup>1</sup> This follows, inter alia, from Executive Order No. 1882/2020 on personal data security in connection with the provision of public electronic communications services and number-independent interpersonal communications services, and Executive Order No. 381/2022 on general and indiscriminate registration up to and including 29 March 2023 and retention up to and including 29 March 2024 of traffic data.



- Telephone number
- Customer number
- Email address
- Order number; IP addresses – public and local
- LID number for connections, so that we can register it in our systems (Data Services only)
- URL traffic (Data Services only)
- Traffic usage and data quality in TDC NET connections (Data Services only)
- MAC address of covered equipment (Data Services only)
- Wi-Fi SSID (Data Services only)
- Wi-Fi SSID password (Data Services only)

#### **Purposes of our processing of personal data in connection with the Services**

- To provide access to the internet
- To provide access to the email service (see the separate data processing agreement concerning this)
- To provide a product that gives access to security software that protects smartphones and tablets
- To provide a product that protects the customer against security risks on both mobile and stationary devices when accessing the internet
- To operate a network at the customer's premises as a service

#### **The processing carried out using the personal data**

- Creation and administration of subscriptions
- Retention in accordance with the Danish Logging Order (Data Services only)

#### **Our legal basis for processing personal data**

The legal basis for our processing of your personal data is our contractual obligation towards our customers, as the processing is carried out as a prerequisite for the delivery of the Services.

In addition, as a provider, we have a legal obligation under the Danish Logging Order to register traffic data relating to the use of Data Services.



### **Sources**

For Data Services, we receive personal data in the form of traffic usage and data quality from TDC NET A/S or another data provider that provides the wired network. If, in connection with the installation of a connection, you order additional purchases, for example excavation, we receive information about these purchases as well as a customer key or LID number from TDC NET or a local fibre provider for billing purposes.

We also collect personal data about you from the company that makes the Service available to you.

The collection of the information is a prerequisite for entering into an agreement with us. If we do not have access to the personal data, we are unable to deliver the requested product/service.

### **Recipients of your personal data**

- In order to give you access to the Services, we disclose a very limited amount of your personal data to TDC NET A/S and, where applicable, to your local fibre provider
- TDC Erhverv discloses personal data to Capgemini in connection with the operation and maintenance of Data Services
- With regard to the legal basis for transfers to third countries for selected Services, reference is made to section 3.1, "Access to and sharing of information", of TDC Erhverv's general Privacy Notice
- For the TDC Erhverv Guard and Freedom products, data is disclosed for operation and support to: F-Secure Corporation, Tammasaarekatu 7, P.O. Box 24, 00181 Helsinki, Finland
- For the Smart Wi-Fi and Smart Security products, data is disclosed for operation and support to: Cisco Systems Danmark ApS, Lautrupsgade 7, 2100 Copenhagen Ø, Denmark, company registration no. 20456078; data is stored on servers in the EU

### **Processing locations**

- We use TDC NET's infrastructure to host the Services, i.e. servers in Denmark
- Capgemini accesses the servers from various locations in the EU



- Third-party software may involve locations outside the EU. If you have any questions, you can contact [DPO@nuuday.dk](mailto:DPO@nuuday.dk)

**Retention period**

We retain your personal data for as long as necessary to fulfil the purposes stated above. Under the rules of the Danish Bookkeeping Act, some of your personal data is also retained for up to five years.

**Contact**

If you would like further details about the processing of your personal data in connection with the use of the Services from TDC Erhverv, you can contact our Customer Service on telephone number +45 70 70 90 90.

This Privacy Notice was updated in January 2026



## Service specific Privacy Notice – TDC Erhverv **System Monitoring** (SOC services excluded)

When you use TDC Erhverv's services in the System Monitoring category (collectively referred to as the "Services"), TDC Erhverv (Nuuday A/S), as an independent data controller, collects and processes a range of personal data about you.

TDC Erhverv is subject to several strict requirements under telecommunications legislation concerning the delivery of communications network services.<sup>2</sup>

This reduces customers' ability to issue instructions to such an extent that the relationship is not a data processor relationship, and no data processing agreement is required.

The position may be different for other services. In our Service Overview at [tdc.dk/vilkaar](https://tdc.dk/vilkaar), you will find an overview of all our services and information on whether a data processing agreement is required.

In this Privacy Notice, we describe the circumstances relating to our processing, use and disclosure of personal data solely in connection with the Services specified above.

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### **Specifically for TDC Erhverv Guard and Freedom**

TDC Erhverv does not have access to the data contained in TDC Erhverv Guard, which is controlled by the supplier F-Secure. The customer enters into a separate agreement with F-Secure concerning this, to which reference is made. F-Secure's privacy policy applies when TDC Erhverv Guard is used. Link to the privacy policy: <https://www.f-secure.com/dk-da/legal/privacy/statement>

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### **Types of personal data**

When you use the Services, the following personal data is collected, verified or otherwise processed in our internal systems:

- Name
- Address
- Telephone number
- Customer number
- Email address
- Order number; IP addresses – public and local
- MAC address of covered equipment
- Wi-Fi SSID
- Wi-Fi SSID password
- Identification number
- Codes for TDC Erhverv Self-Service
- Device type
- Traffic types (e.g. web, Facebook, video, etc.)
- Location information based on Cisco Meraki equipment

### **Purposes of our processing of personal data in connection with the Services**

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- To provide access to the email service (see the separate data processing agreement concerning this)
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- To provide a product that protects the customer against security risks on both mobile and stationary devices when accessing the internet
- To operate a network at the customer's premises as a service

### **The processing carried out using the personal data**

- Creation and administration of subscriptions
- Scanning and analysis for viruses on mobile phones
- Registration of users who log on to Wi-Fi, the time of logon, URLs accessed, time spent on URLs, location of logon, device type, traffic volume, and anonymisation of data about users who do not log on to the solution but are within the network's signal range



- For the TDC Erhverv Guard and Freedom products, the information is disclosed to F-Secure, which provides the technology. F-Secure is an independent data controller in relation to the processing of personal data that takes place in connection with the customer's use of TDC Erhverv Guard and Freedom. For further information about F-Secure's processing of personal data, please read its privacy policy at <https://www.f-secure.com/dk-da/legal/privacy/statement> (TDC Erhverv Guard and Freedom products only)
- For the Smart Wi-Fi and Smart Security products, the information is disclosed to Cisco Meraki, which provides the technology. Cisco Meraki is an independent data controller in relation to the processing of personal data that takes place in connection with the customer's use of Smart Wi-Fi and Smart Security. For further information about Cisco Meraki's processing of personal data, please read its privacy policy at <https://meraki.cisco.com/meraki-support/policies/#privacy-policy> (TDC Erhverv Guard and Freedom products only)

### **Our legal basis for processing personal data**

The legal basis for our processing of your personal data is our contractual obligation towards our customers, as the processing is carried out as a prerequisite for the delivery of the Services.

In addition, as a provider, we have a legal obligation under the Danish Logging Order to register traffic data relating to the use of Data Services.

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