

Service specific Privacy Notice – TDC Erhverv Telephony Services

When you use TDC Erhverv's services in the Fixed Telephony and Mobile Telephony categories, including broadband telephony (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 telecommunications services.¹

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, 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

Types of personal data:

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

- Name
- Address
- Telephone number
- Email address
- Information about the telephone numbers called to and from, including

¹ 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.

- withheld/unlisted numbers
- Voicemail messages
- Access codes for TDC Erhverv Self-Service and the Assist App
- Customer number
- SMS and MMS
- Voicemail audio files
- Location data – the position of the mast
- IMEI number (mobile subscriptions only)

Specifically for mobile telephony:

Most mobile subscriptions include mobile data, which provides the customer with internet access. The subscription concerned determines which services the customer has access to. This means that, in addition to the above, the following may be processed when mobile data is used:

- IP address
- MAC address
- Websites visited by the user (URL)

Purposes of our processing of personal data in connection with the Services:

- To enable the user to communicate with one or more other persons
- To enable the user to leave or listen to messages
- To enable the user to access the internet (mobile data)
- To enable us to generate an invoice
- To reduce the risk of spoofing (unauthorised use of a telephone number as the A-number)

The processing carried out using the personal data:

- Creation and administration of the subscription
- Transmission of telephone calls
- Transmission of SMS and MMS
- Recording of voicemail messages
- Listening to voicemail messages
- Generation of call history (usage, date, time, etc.)

Our legal basis for processing the personal data:

The legal basis is our contractual obligation towards our business customers, as the processing is carried out as a prerequisite for the delivery of the Services as defined in a contract.

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

Sources:

We collect personal data directly from you for the purpose of delivering the Services, and we share personal data in the form of traffic data, location data and call recordings with TDC NET A/S in connection with delivery, including troubleshooting.

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

The collection of the personal data 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 Services.

Recipients of your personal data:

- In order to transmit your telephone calls, text messages and data, we disclose a very limited amount of your personal data to TDC NET A/S
- TDC Erhverv discloses personal data in connection with the operation and maintenance of the Services to Capgemini

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

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

