

Privacy Statement Telegraaf Media Groep N.V.

Introduction

This Privacy Statement is applicable to all products and services of Telegraaf Media Groep N.V. and its subsidiaries (TMG) unless they expressly apply their own privacy statement. Click [here](#) for an overview of TMG's products and services.

In this statement, we explain which of your personal data TMG processes, for what purposes and the basis for that processing. We also explain how long we retain your data, the parties with which we share data and what your rights are in respect of these data, for example a right of access or erasure.

The controller for the data processing is Telegraaf Media Groep N.V., Basisweg 30, 1043 AP Amsterdam. TMG has appointed Mr Marc Cox as data protection officer.

Processed personal data

Data provided by you

If you subscribe to one of our products or services, if you register, order a publication, sign up for an email newsletter, participate in a marketing campaign, contact TMG or otherwise use the services of (a part of) TMG, the personal data you provided will be recorded and processed.

Data obtained via cookies and similar technologies

In addition to the personal data that you yourself provide to TMG, TMG may also collect, record and process additional personal data related to your use of TMG's services. It obtains these data using cookies and similar technologies. This concerns the following personal data:

- device data, operating system data and, if applicable, browser data as well, with which access to a TMG service was obtained. For example, this could be the advertisement ID of a mobile device, the version of the operating system and the type of browser you use to gain access to a service;
- data related to the use of a service, such as your surfing behaviour, when you use a service and the type of service used; this information can be linked to your account when you are logged in;
- location data originating from your device or derived from your IP address which is transmitted to us when you use a particular service. Prior to the installation of apps that transmit the location of the (mobile) device, you will be expressly asked for consent for the processing of the location data of the (mobile) device.

You can find more information about cookies and similar technologies and their use on the websites and apps of TMG [here](#).

Data received from third parties

Lastly, TMG may collect, record and process personal data that it receives from third parties. This concerns the following personal data:

- data that you have provided to one of TMG's partners for the purpose of these data being transferred to TMG, for example if you register for a TMG newsletter via a partner;

- when you log in on a TMG website or app using your social media account via a third party, TMG receives the log in data of your social media account and public profile information;
- data for the verification and enrichment of the data we have, including your address, telephone number, gender and age. This is done via TMG data partners, such as [CDDN](#) and [EDM](#);
- data for the purpose of one of our services that are disclosed by third parties for a similar purpose, for example the placement of classified ads;
- data about your surfing behaviour on the websites of other publishers that participate in the NLProfiel initiative of Buymedia, which are Sanoma and the Persgroep. You can find more information about this [here](#).

Purposes and basis of data processing

TMG processes your personal data for the following purposes:

- for the conclusion and performance of the contract, for example to provide the products, services or information chosen by you;
- if you have purchased a paid service or product, to invoice;
- to give you an opportunity to post and exchange information via one of TMG's digital services or to contact other users of those digital services.

The processing of your data for the foregoing purposes is necessary for the performance of the contract you enter into with TMG when you purchase a product or service.

- to be able to offer you our products and services as completely as possible and to maintain, optimise and secure them;
- to keep you informed of the products and services of TMG;
- to send you a newsletter, user information, service message or other message (electronic or otherwise).

The basis for the processing of your data for the foregoing purposes is a legitimate interest of TMG, consisting of the interest in improving and securing our products and services, in communicating with you regarding relevant information about our services (user information and service messages) and in performing (direct) marketing activities (commercial messages). If you have never had a paid customer relationship with TMG, TMG will only send you commercial messages if you have given your consent.

- to enable logging in via social media sites (offered by third parties).

The basis for the processing of your data for the foregoing purpose is consent. You give this consent by logging in on one of the TMG websites or apps using your social media account.

- to show you online targeted advertisements through classification in a group profile based on characteristics and behaviour;
- to show you specific TMG advertisements on third-party websites. This can be done, for example, by creating specific target groups on Facebook and/or Google using targeting tools by uploading (encrypted) email addresses. Targeted advertisements are then shown to these target groups;
- to improve products and services. Based on information about your interests and your use of our products and services, TMG tries to improve its products and services and to better tailor them to your use and interests.

The basis for the processing of your data for the foregoing purposes is consent. You give this consent by accepting the cookie statement on a TMG website or app.

- in order to comply with the legislation and regulations applicable to TMG, such as the retention obligation for the Dutch Tax Administration (Belastingdienst).

The basis for the processing of your data for the foregoing purposes is TMG's compliance with a legal obligation.

For the aforementioned purposes, your personal data may be exchanged with or made available to all parts of the group of which TMG is part (the Mediahuis group). It is also possible that when you use various TMG products and/or services, your personal data processed in that connection may be combined with data originating from (the use of) other TMG products and/or services and/or from third parties (as mentioned above at "data received from third parties") to form a profile. When our digital services are used, it is possible that an account will be created for you automatically using the personal data provided by you in connection with one of our other services. *Example: when you subscribe to De Telegraaf, a MijnMedia account will automatically be created for you for self-service purposes.*

[Transfer of data to third parties](#)

Without your permission, your data will not be provided to parties that are not part of the Mediahuis group, with the exception of the following.

Performance of a contract

If providing data to a third party is part of the contract you entered into with TMG, we will provide your data to the relevant third party in accordance with the contract.

Parties engaged by TMG

Your data may be provided to parties without your consent, which parties are engaged by TMG for the performance of its services. These include providers of delivery and payment services, software and SaaS (Software as a Service) services, (advertising) platforms, hosting services, (direct) marketing services and collection agencies. In such a case, your data will only be used on TMG's instructions for the purposes referred to in this statement.

Provision for the purpose of advertisements

To be able to offer advertisements in as targeted a fashion as possible, the information that TMG collects regarding your surfing behaviour on its websites, including personal data, is combined with information about your surfing behaviour on the websites of other publishers that participate in the NLProfiel initiative of Buymedia, which are Sanoma and De Persgroep, in order to compile collective group profiles, provided you have given consent for this. In connection with this, if you have given consent, TMG will share the information it has collected, including personal data, with the relevant publishers and Buymedia for the creation of the collective group profiles. You can find more information about this [here](#).

TMG also sends certain information, such as IP addresses, to media agencies, advertisers, advertising networks and/or data partners for the purpose of the (automatic) sale of advertising space, and the group profiles compiled by TMG using your data can be provided to media agencies, advertisers, advertising networks and/or data partners of TMG for the display of relevant advertisements. The profiles compiled by TMG always consist of a group of users (for example sports enthusiasts in the age range of 20 to 30).

Mandatory provision

Lastly, it is possible that TMG is required, based on applicable laws and regulations, to provide certain data, to the police for example, in connection with a criminal investigation or to a third party if the

content of a comment posted by you on a TMG website is unlawful vis-à-vis that third party. In these instances, TMG will only provide data if it is clear that it is obliged to do so.

Transfer outside the EU

Some of the parties to whom we provide data are international companies. In that case, it is possible that your data will also be processed outside the EU. In principle, this will only be done in countries with an appropriate level of protection. If that is not the case, TMG will safeguard the protection of your data by using the standard contractual clauses drawn up for this purpose by the European Commission. These can be found [here](#).

Data processing by third parties via TMG websites and apps

Third parties may also place cookies and similar technologies via TMG's websites and apps and use them to collect your data. These third parties may be advertisers that purchase advertising space on TMG's websites and apps and social media parties that offer certain services on TMG's websites and apps (such as the share button). In addition, you may end up on the website or app of a third party via a TMG website or app, for example via an (embedded) link. In all these instances, the conditions and privacy rules of the relevant third party are applicable. You are advised to consult this third party's privacy statement.

You can find more information about cookies and similar technologies and their use by third parties via TMG's websites and apps [here](#).

Telephone calls to customer service

Telephone calls to the customer service of (a part of) TMG may be recorded for training and coaching purposes. The recordings will not be retained any longer than is strictly necessary and are not accessible to unauthorised persons.

Retention period

TMG processes the collected data as long as this is necessary for the purposes for which the data were collected or is necessary to comply with legal obligations. For example, customer data are retained until two years after the end of the customer relationship. In addition, TMG is legally required to retain invoicing and payment data for seven years under tax legislation.

Security of data

TMG respects the privacy of every data subject and ensures that personal data are treated confidentially and with the greatest possible care. All personal data are securely stored in TMG's administration. TMG also makes reasonable efforts to secure its systems against loss and/or against any type of unlawful use or processing and when doing so, uses appropriate technical and organisational measures, including taking the state of the art into account.

Your rights in respect of your data

Below, we list the rights you can exercise in respect of your personal data that TMG processes. You can exercise these rights via [this page](#).

Right to access, rectification or erasure of personal data, right of objection and restriction

You can gain access to your data that TMG processes at all times and free of charge and, if you so desire, have these data modified or supplemented if they are incorrect or incomplete. In certain instances, you can also have your personal data erased, for example if these are no longer necessary for the purpose for which they were provided. You can also object to the use of your personal data or revoke consent given previously. In some instances, you can have the use of your data suspended temporarily, for example if there is uncertainty about the accuracy of the data.

Right to data transfer

You can request the data that TMG automatically processes with your permission or in connection with the performance of your contract with TMG or (if technically possible) have them transferred to another party.

Right of complaint

If you have a complaint related to the processing of your personal data, you can report this via privacy@tmg.nl. You can also use this email address to contact TMG's data protection officer. You can also report your complaint to the Dutch Data Protection Authority.

Please note:

If you want to unsubscribe for a certain newsletter or commercial e-mail of a brand of TMG you can use the unsubscribe link which can be found at the bottom of the received mailing.

[Amendment of this Privacy Statement](#)

TMG reserves the right to amend this Privacy Statement. Every amendment will be published on this page. We recommend that you consult this Privacy Statement on a regular basis to ensure that you are always aware of the content of the applicable Privacy Statement.

This Privacy Statement was last amended on 18 September 2018