

# Privacy Policy

December 2018

Data privacy policy for D-Light GmbH ("D-Light").

## 1. General

The protection of your personal data is of high import to us at D-Light and we handle it with the utmost care. We process your personal data solely on the basis of legal requirements (General Data Protection Regulation EU 2016/679 – GDPR, Telecommunications Act 2003 – TKG). This data privacy statement informs you about our measures regarding data security and data processing.

If you contact us through a form on our website or via e-mail, the personal data you provide will be stored for six months for processing and for the event of follow-up questions. We do not share this data without your consent. It is D-Light's principal concern to inform you about the processing of your personal data during the use of our products and services if you request this information.

This privacy policy applies to D-Light in Austria.

We kindly ask you to carefully read this privacy policy, our general terms, as well as the terms of use for our products and services. We reserve the right to change and/or amend this policy if necessary. The most recent version of the policy is always available to you on this website.

## 2. Why we need your personal data and what we use it for

Your personal data are required for the use of our products and services.

The data D-Light requires are as follows:

**Basic data:** first and last name, date of birth, academic degree, address or further contact data such as your e-mail address, and type and content of the contractual relationship with D-Light, etc.

**Traffic data:** data regarding the use of D-Light's products and services. These contain specifically the amount of active and passive users, time and duration of the connection and the size of data transfer, identification of the terminal device (IP address, IMSI number, IMEI number, MAC address, etc.).

**Location data:** the location within a communications network or of a communications service that identifies the geographic location of the terminal device of a user in a public network.

**Other personal data:** data you provide to D-Light or third parties due to the contractual relationship. These include, but are not limited to, civil status, occupation, ID and bank data, preferred payment method, preferred means of contact, and related approvals and delivery addresses.



**Authentication data:** any usernames, customer numbers, passwords, customer codes, and PINs.

**Content data:** contents of messages and files that are related to D-Light's products and services and, therefore, need to be forwarded to third parties. These include, but are not limited to, the contents of emails and attached files, and voice recordings from calls to D-Light's customer service.

**Use data:** data regarding the type and frequency of use of D-Light's products and services, such as data size, type, time, and duration of connections, data needed for the use of mobile applications.

We use and process the data you provide for the following:

- billing of services relevant to the contract, and contract processing;
- marketing of our products and services, including the sending offers and information;
- compliance with legal specifications and disclosure to emergency dispatchers or authorities due to legal obligations;
- troubleshooting and design work; and
- prevention of misuse and fraud.

**Collection:** disclosure of specific data, such as name, address, e-mail address, gender, telephone number, and date of birth, and information regarding the arrearage in payments or transfer of active debt to collection agencies and/or lawyers.

### 3. Data storage

Personal data have to be stored in a form that allows for the identification of the person in question only so long as it serves the purpose of their processing. If no active debt remains after termination of the contract with D-Light, all personal data will be deleted (except where legal specifications mandate otherwise).

**Storage limit:** there are legal obligations to preserve records which might invalidate a request for the deletion of personal data. Should this be the case, D-Light will inform the person requesting the deletion and explain the impossibility of timely data deletion.

**Transfer of data:** in order to provide the best products and services, D-Light might collaborate with partners and/or suppliers in specific cases. In accordance with legal specifications, personal data might then be transferred to third parties and/or external service providers (e.g. postal services, etc.).

**Data integrity:** the protection of your personal data is highly important to D-Light and we always endeavor to provide you with the best security. We therefore fully comply with the statutes of the TKG and the GDPR.

#### 4. Cookies

D-Light's website uses cookies in order for us to create offers that are user-friendly and tailored to your needs. A few cookies will remain stored on your device until you delete them manually; these allow us to recognize your browser the next time you visit our website.

#### 5. Your rights under the GDPR

Regarding your personal data stored with D-Light, you inherently have the right to information, correction, deletion, restriction, data transferability, revocation, objection, and complaint. If you are under the impression that the processing of your personal data is against the data protection laws or that your rights in terms of data protection are being violated in any way, please do not hesitate to approach [D-Light](#) or the Austrian data protection authority with the issue.

Below, the individual rights are defined in extract:

Your right to information: you have the right to, upon request, receive a confirmation from D-Light about whether and which personal data of yours are being processed. Furthermore, you can request the following details regarding the use of your personal data:

- the purpose of processing;
- the categories of personal data that are being processed;
- the recipients or categories of recipients to whom your personal data have been or will be disclosed; and
- if possible, the planned duration of storage of your personal data or, if it is not, the criteria for setting this duration.

You have the right to correction or deletion of your personal data. Personal data must be factually correct and, where changes may apply, up to date. All necessary measures must be taken to remove or revise incorrect personal data.

In this context, duties to report arise. If personal data have been revised, removed, or restricted upon request by the affected person, the responsible party has to relay this information to everyone the personal data have previously been disclosed to. D-Light is exempt from the duty to report when relaying the information is impossible or tied to disproportionate expenses. The affected person has the right to be informed about the recipients of their personal data.

In some cases, the right to restriction comes into play: for example, when the affected person disputes the correctness of the personal data or when the processing is unlawful. It is possible that the purpose of the processing is resolved, but the personal data still need to be stored to assert legal claims of the affected person. The same applies when an objection in accordance with art. 21 GDPR by the affected person is at hand.

You also have the right to revocation in accordance with art. 21 GDPR. Any consent given to processing of personal data which are not necessary for the fulfillment of the contract or legal requirements can be revoked or limited to particular contact channels. This can be done in writing or via e-mail, at no cost and without specifying reasons.



Additionally, you have the right to objection in accordance with art. 21 GDPR. The person in question has the right to object to the processing of their personal data for reasons arising out of their specific situation. D-Light will no longer process the personal data except where compelling, worthy of protection reasons apply that outweigh the rights and freedom of the person in question, or when the processing of the personal data serves the enforcement, exercise, or defense of legal claims. For the duration of the review, the person in question has the right to restriction. During this time, the processing of the personal data is frozen.

Lastly, you have the right to complaint. If you are under the impression that your rights in terms of data protection are being violated in any way, you can also lodge a complaint with the Austrian data protection authority within one year of becoming aware of the violation or issue.

## 6. Contact

If you have any questions about or issues with the protection of your personal data at D-Light, please feel free to contact us so that we can offer you a solution in a timely manner:

### D-Light GmbH

Vienna Twin Tower A 14 C  
Wienerbergstraße 11  
1100 Vienna

E-mail: [office@d-light.at](mailto:office@d-light.at)  
Phone: +43 (0)1 96 2010