

Data Processing Agreement for LINK's provision of Messaging Services Scope Appendix

Scope of the processing

The DPA concerns LINK's processing of Personal Data on behalf of the Controller in connection with provision of messaging services. The Messaging Services include Controller's access to LINK's solutions for managing messaging to message recipients chosen by Controller for purposes and frequency as chosen by Controller by use of the service. The Agreement will provide further insight into the specific type of messaging services provided to Controller under the Agreement. The Parties may agree to different scope in the Service Order. In such case, the agreed scope shall take precedence over this scope appendix.

Categories of Data Subjects

The categories of Data Subjects whose personal data may be processed under this DPA are defined by controller. The processing involves processing of Personal Data related to Controller's end-users (recipients and/or senders of messages depending on the Controller's use of the services under the Main agreement). The Parties may describe additional categories in the Service Order.

Types of Personal Data

The Processing relates to the following types of Personal Data, subject to the Controller's concrete use of the services:

- Basic Personal Data, such as name, contact details such as email, phone number etc.
- Location data, such as GPS, Wi-Fi location data and location data derived from LINK's network (that is not traffic data as defined below).
- Traffic data: personal data processed in relation to the conveyance of communication on an electronic communications network or billing thereof.
- Data related to content of communication, such as e-mails, voice mails, SMS/MMS, browsing data etc.

Special categories of Personal Data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or health data, will be processed under this DPA if the services are used by customer to process such data.

The Parties may describe additional types of Personal Data in the Service Order.

Subject-matter of the processing

The subject-matter of LINK's processing of personal data on the customer's behalf is the provision of services to the Customer that require processing of personal data. Personal data will be subject to processing activities as specified in the main agreement.

Duration of the processing

The processing will continue for the duration of Customer's contract with LINK. LINK will retain Personal Data for as long as it is necessary to fulfil the purposes for processing. Duration is described in Privacy notice on <https://www.linkmobility.com/legal/privacy>

Specific retention time may be agreed in Service Order.

Nature of the processing

Personal data will be processed by Customer entering the data into LINK's platform, either through its access to LINK's platform, or by providing data to LINK employees in order for them to enter data to the customer's area of the platform. The data will further be processed in order for messages to be set up as required by customer, and the list of recipients to be correct, before the process for sending the defined messages to the defined recipients is initiated.

Purpose of the processing

The purpose of engaging LINK to process personal data on customer's behalf is for customer to fulfil its requirements for communication towards End Users.

Sub-processors

The Sub-processors approved under this DPA are found in <https://www.linkmobility.com/legal/privacy/sub-processors>

This DPA is regarded as an instruction from Customer to transfer Personal Data to the listed sub-processors.