



elisa

# Privacy Policy of Elisa

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## OVERVIEW

This privacy policy has been prepared on the basis of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (hereinafter referred to as the **Regulation**) and Chapter 10 of the Electronic Communications Act, and it regulates the processing of customer data by Elisa Eesti AS and Elisa Teleteenused AS (hereinafter referred to as **Elisa**).

The privacy policy consists of **definitions**, the **general part** and the **special part**. The general part provides a broader regulation of the issues related to the processing of customer data and the special part specifies the issues related specifically to the processing of Personal Data.

### 1. DEFINITIONS

- 1.1. **Customer** means any natural or legal person who uses, has used or has expressed the desire to use Elisa's services.
- 1.2. **Data Subject** means a natural person on whom Elisa has data in reference to which the person can be identified. Data Subjects are potential, existing and former customers, users of mobile telephone numbers, prepaid card users, gift card users, data subject representatives, partners, makers of queries and guests.
- 1.3. **User** means a natural person appointed by the Customer who, with the Customer's consent and while the customer remains liable, uses the services provided by or via Elisa to the Customer's mobile telephone number.
- 1.4. **Prepaid Card User** means a natural person who uses Elisa's communication services with a prepaid card.
- 1.5. **Gift Card User** means a natural person in whose name a gift card has been issued.
- 1.6. **Data Subject Representative** means a natural person who represents the Data Subject either on the basis of law (guardians) or a contract (authorised persons).
- 1.7. **Partner** means a person with whom Elisa has entered into a contract for the development of business operations (e.g. a contract for the establishment of a right of superficies, a contract for the establishment of a personal right of use, a tenancy contract, etc.).
- 1.8. **Request Submitter** means a natural person who submits a request for information to Elisa.
- 1.9. **Guest** means a natural person who has visited Elisa's sales or service channels.
- 1.10. **Customer Data** means any information about the Customer and the User known to Elisa.
- 1.11. **Personal Data** means any information about an identified or identifiable **natural person**. An identifiable natural person means one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.12. **Service Data** means data on the details of use of a service, which are disclosed to Elisa in the course of provision of the service.

- 1.13. Service Consumption Address** means the Customer's physically determined place of residence or location for the use of the ordinary telephone service and online Internet service.
- 1.14. Location Data** means the data generated upon provision of a communications service, which indicate the estimated and likely geographical location of the SIM card.
- 1.15. Biometric Data** means the Personal Data obtained by way of specific technical processing about the person's physical, physiological and behavioural properties, which allow for said person to be uniquely identified or confirm the identification of such natural person, such as the facial image.
- 1.16. Health Data** means the Personal Data that concern the health of the Data Subject. Health Data means genetic data and weight assessment (Elisa Lifestyle).
- 1.17. Customer Data Processing** means any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.18. Profiling** means any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning said natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- 1.19. Anonymisation** means making Personal Data anonymous in such a manner that a specific data subject can no longer be identified. Unlike pseudonymisation, anonymisation does not allow for reconnection of Personal Data with a specific Data Subject afterwards in any way.
- 1.20. Controller** means the natural person or legal entity, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of Personal Data processing (e.g. Elisa and the other service providers specified in clause 3.2.1.).
- 1.21. Processor** means the natural person or legal entity, public authority, agency or other body which processes Personal Data on behalf of the Controller. The categories of processors are given in clause 3.4.2.4.
- 1.22. Data Processing Systems** means the databases and information systems used by Elisa, where Personal Data are processed (including the self-service environment).
- 1.23. Data Processing Registers** means the public registers managed by private persons or public entities that include Personal Data. The data processing registers are given in clause 3.2.1.

## **2. GENERAL PART**

### **2.1. LAWFULNESS OF CUSTOMER DATA PROCESSING**

- 2.1.1. Elisa is fully committed to the confidentiality and protection of Customer Data and ensures that Customer Data are processed in accordance with the law.
- 2.1.2. Customer Data are processed in Elisa primarily according to the requirements stipulated in the Electronic Communications Act.

### **2.2. SECURITY OF CUSTOMER DATA PROCESSING**

- 2.2.1. Elisa applies organisational, physical and information technology security measures to protect Personal Data proceeding from the best practices of information security.
- 2.2.2. Elisa may use Processors for Customer Data processing. Elisa ensures that the Processors process Customer Data according to the instructions of Elisa and in accordance with applicable law and take relevant security measures.
- 2.2.3. Elisa only allows Processors to access Customer Data. The Processor has the right to process Customer Data only to the extent required for the achievement of the goals set by Elisa.
- 2.2.4. The Processors must comply with Elisa's Customer Data processing requirements.

## **3. SPECIAL PART**

### **3.1. LAWFULNESS OF PERSONAL DATA PROCESSING**

- 3.1.1. Upon Personal Data processing, Elisa ensures that:
  - the processing is lawful, fair and transparent in relation to the Data Subject;
  - Personal Data are collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
  - the Personal Data are relevant, important and limited to what is necessary in relation to the purposes for which they are processed;
  - the Personal Data are correct and, where necessary, kept up to date, and all reasonable measures are taken to ensure that the Personal Data that are incorrect in respect of the purposes for which they are processed are immediately deleted or corrected;
  - Personal Data are kept in a form that permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are processed;
  - Personal Data are processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organisational measures.

- 3.1.2. The goal of Elisa is to guarantee processing that is responsible and proceeds from the interests, rights and freedoms of the Data Subject.
- 3.1.3. Personal Data processing at Elisa takes place according to the requirements established in the **Regulation**.

## 3.2. SOURCES AND TYPES OF PERSONAL DATA

Elisa collects Personal Data for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

The submission of Personal Data is necessary for the establishment of a customer relationship and the achievement of the goals specified in clause 3.3. of this document.

3.2.1. Elisa processes Personal Data obtained from:

- the **Data Subject** (e.g. in pre-contractual negotiations, upon entry into contracts, during the terms of contracts, upon use of a prepaid card, upon registration of a gift card, upon use of the Elisa app, when making a request for information, upon use of the self-service bureau, when visiting sales and service channels);
- **data processing registers** (e.g. e-Krediinfo, number booking database (NBA), the Population Register, the Land Register (to find Partners);
- **from other service providers** (e.g. certification service providers (Mobile ID), insurance companies (Nutikindlustus), providers of special rate and M-payment services).

3.2.2. Elisa classifies the processed Personal Data as follows:

3.2.2.1. **directly identifiable data of a Data Subject** means the data which the Data Subject submits about themselves or which are submitted about the Data Subject:

- **Personal data:** forename and surname, personal identification code, language of communication, profile photo in social media.
- **Physical data:** gender, age, height, weight and Health Data.
- **Identifiable data:** username, password (initially given by Elisa), telephone service password, details of an identity document, including a copy of the identity document, facial image and specimen signature.
- **Contact details:** e-mail address, contact address, contact numbers, delivery address, address where notifications are to be sent.
- **Invoicing details:** bank account number, invoicing address.

3.2.2.2. **Indirectly identifiable data of the Data Subject** means the data generated in Elisa's data processing systems because of or independently of the data subject.

a. **Data resulting from the Data Subject** means data generated in Elisa's data processing systems as a result of an activity of the data subject:

- **Consumption Data:** contract details (e.g. the contract number, credit limit, total amount of instalments), service details (e.g. service choices and the

details of use of a service), SIM card location data, service consumption address.

- **Customer Events:** invoice details (e.g. the invoice number, due date), payment history, debt and advance payment information, balance of the current month, self-service environment usage history, customer notifications (e.g. advertising offers, debt notices, etc.), data subject inquiries via various service channels, data received from a satisfaction survey, data received from a market survey (e.g. the data subject's preferences, gender, age and occupation), video recordings, call recordings and cookie information.

**b. Data independent of the Data Subject** means the data generated in Elisa's data processing systems independently from an activity of the data subject:

- **Customer identifiers:** credit profile, marketing profile, customer number, customer feature (device maintenance), reference number, Google ID.
- **Service identifiers:** service number, mobile telephone number, fix number, SIM card serial number, international mobile subscriber identity (IMSI), IP address;
- **Device identifiers:** the device's identification code (e.g. IMEI or MAC), PUK 1 and PUK 2, issued PIN 1 and PIN 2.

### **3.3. LEGAL GROUNDS FOR AND PURPOSE OF PERSONAL DATA PROCESSING**

Elisa processes Personal Data either for the performance of a contract or for guaranteeing the performance of a contract on the basis of the consent of the Data Subject or legitimate interest or for the performance of an obligation arising from law.

**3.3.1. Elisa processes Personal Data for the performance of a contract and guaranteeing the performance** of a contract for the following purposes:

**3.3.1.1. identification of the Data Subject or their representative.** Elisa processes the Personal Data of the Data Subject (e.g. name, ID code) and identifiable data (e.g. phone service password, details of identity document) in order to identify the Data Subject or their representative.

**3.3.1.2. preparation and conclusion of the contract and the other documents associated with contracts (e.g. applications for porting services, agreements on suspension of mobile phone numbers, agreements on termination of mobile phone numbers).** Elisa processes the Data Subject's Personal Data, identifiable data (e.g. number of identity document), contact details (e.g. contact address), invoicing data (e.g. invoicing address) and customer identifiers (e.g. credit profile), service identifiers and device identifiers in order to prepare and conclude contracts and the other documents associated with contracts. Service consumption data (e.g. service data) are also processed in the case of upselling.

**3.3.1.3. delivery of contracts, the cards (SIM cards) and devices required for the use of services.** For the purposes of delivery, Elisa processes the Data

Subject's Personal Data (e.g. name), contact details (e.g. delivery address, contact number), service data (e.g. service selection), customer events (e.g. debt and prepayment information) and customer identifiers (e.g. customer number).

- 3.3.1.4. **management of contracts and other documents associated with contracts.** Elisa processes the Data Subject's Personal Data (e.g. name, ID code), customer identifiers (e.g. customer number), consumption data (e.g. contract number), customer events (e.g. invoice number), service identifiers (e.g. mobile phone number) and device identifiers (e.g. IMEI) in order to manage contracts and other documents associated with contracts.
- 3.3.1.5. **guaranteeing the functioning and quality of services.** Elisa may process all of the Data Subject's Personal Data in order to guarantee the functioning and quality of services.
- 3.3.1.6. **forwarding notifications of service failures and elimination of failures.** Elisa may process all of the Data Subject's data for forwarding failure notifications and elimination of failures, depending on the failure.
- 3.3.1.7. **servicing the Data Subject, incl. maintenance of the Customer's device.** Elisa may process all of the Data Subject's Personal Data in order to serve the Data Subject, depending on the service situation.
- 3.3.1.8. **preparing and sending invoices for the Data Subject.** Elisa processes the Data Subject's Personal Data, contact details (e.g. service consumption address), invoicing data (e.g. invoicing address), consumption data, customer events (e.g. prepayment, debt information), customer identifiers (e.g. customer number, reference number), service identifiers (e.g. service number, mobile phone number, landline number) and device identifiers (e.g. IMEI) to prepare and send invoices to the Data Subject.
- 3.3.1.9. **verification/updating of the Data Subject's Personal Data, correction of Personal Data, if necessary.** Elisa processes the Data Subject's Personal Data and contact details and sends queries to the Population Register if necessary in order to verify/update and correct the Personal Data.
- 3.3.1.10. **debt collection.** Elisa processes the Data Subject's Personal Data (e.g. name, ID code), contact details (e.g. contact address, e-mail address and contact number) and customer identifiers (e.g. customer number) in order to collect debts.
- 3.3.1.11. **assignment of debts.** Elisa processes the Data Subject's Personal Data (e.g. name, ID code), contact details (e.g. contact address, e-mail address and contact number) and contract and invoice data in order to assign debts.
- 3.3.1.12. **preparing and sending legal claims to court.** Elisa processes the Data Subject's personal, identifiable data (e.g. document copy), contact and invoicing data, consumption data, customer events (e.g. invoice data, payment history, debt and prepayment information), customer identifiers (e.g. customer number), service identifiers and device identifiers (e.g. IMEI code) in order to prepare legal claims.



- 3.3.2.** Elisa processes Personal Data on the basis of the **Data Subject's consent**. Elisa processes Personal Data on the basis of the consent of the Data Subject only to the extent and for the purposes to which the Data Subject has consented. The consent of the Data Subject must be clearly distinguishable from other issues, in a format that is understandable and easily accessible and in a clear and simple language. The Data Subject gives their voluntary, specific, informed and unambiguous consent by, for example, ticking a box in the contract or in the self-service. Elisa processes Personal Data on the basis of the Data Subject's consent for the following purposes:
- 3.3.2.1. **direct marketing, incl. profiling for marketing purposes.** Elisa prepares the marketing profiles of Customers in order to offer the services/products of Elisa and Elisa's Partners to the Data Subjects. Based on the marketing profiles, Elisa e-mails the innovative service and/or product offers of Elisa and Elisa's Partners to Customers. Additional information on direct marketing principles, incl. the marketing profile, can be found in ["Elisa's Marketing Policy"](#).
- 3.3.2.2. **use of cookies.** Elisa uses cookies in order to improve the website user experience, evaluate the use of the website and support the marketing of Elisa's services. Cookies are important for making Elisa's online services easier and more convenient, monitoring the use of the website and providing better services to the Data Subject. Additional information on the use of cookies can be found in the ["Cookie Policy"](#).
- 3.3.3.** Elisa processes Personal Data on the basis of **legitimate interest**. Legitimate interest means Elisa's interest to process Personal Data in association with the company's business operations in order to offer its Customers the best services and customer service. Elisa processes Personal Data on the basis of legitimate interest only if, after thorough analysis of the legitimate interest, it has been identified that the processing is necessary and in compliance with the rights and interests of the Data Subject. Elisa processes Personal Data on the basis of legitimate interest for the following purposes:
- 3.3.3.1. **assessment of the creditworthiness of the Data Subject.** Assessing the creditworthiness of the Data Subject is necessary to guarantee a customer relationship based on trust and the performance of the due diligence obligation of Elisa. Elisa sends queries to e-Krediidiinfo and analyses the Data Subject's profile in relation to the assessment of creditworthiness. Additional information on the logic of the assessment of creditworthiness, its importance and the expected consequences can be found in the ["Elisa's Credit Policy"](#).
- 3.3.3.2. **creation of additional and better options for using services (service development).** Elisa processes the Data Subject's Personal Data (e.g. name, language of communication), contact details (e.g. e-mail address, contract number), consumption data and customer events (e.g. data obtained from market research) in order to offer the Customer additional and better options for using services.

**3.3.3.3. guaranteeing better customer service and customer satisfaction.**

Elisa records service calls and assesses them in order to provide excellent customer service to its Customers. Elisa carries out satisfaction surveys and polls by e-mail and telephone in order to understand what the Customers expect of the services and customer service of Elisa and analyses the feedback in order to provide better customer service and services to the Customers. Elisa processes the Data Subject's Personal Data (e.g. name and language of communication) and contact details (e.g. e-mail address, contact number) in order to guarantee customer satisfaction. Additional information on satisfaction polls and calls can be found in the [“Policy for Satisfaction Polls and -Calls”](#) and information on the processing of service calls can be found in the [“Policy for Processing Call Records”](#).

**3.3.3.4. direct marketing, incl. profiling for marketing purposes.** Elisa prepares marketing profile(s) of its Customers in order to offer the newest or perfected services/products to the Data Subject and thereby improve customer satisfaction. Based on the marketing profile, Elisa makes sales offers to the Customers by telephone and e-mails offers of products or service solutions similar to the products or services used by the Customers to the Customers. Additional information on direct marketing principles, incl. the marketing profile, can be found in [“Elisa's Marketing Policy”](#).

**3.3.3.5. organisation of campaigns.** Elisa organises marketing campaigns to offer new and additional options for using services to the Customer. Elisa analyses the Data Subject's customer events (e.g. data obtained from market research), service and device selections and consumption data in order to organise marketing campaigns.

**3.3.3.6. use of surveillance equipment (video recording).** Elisa uses video recording at its points of sale to protect persons and property. Additional information on the use of surveillance equipment can be found in the [“Surveillance Policy”](#).

**3.3.3.7. guaranteeing the security of the electronic communications network and information.** For example, prevention of access to the electronic communications network, guaranteeing the security of the website. Elisa may process all of the Data Subject's data for said purposes depending on the situation.

**3.3.4.** Elisa process Personal Data for the performance of its obligations arising from **law**, e.g. guaranteeing number portability, entering into Mobile ID contracts and responding to the queries of state authorities. Elisa processes the Data Subject's Personal Data (e.g. name, ID code) and customer identifier (e.g. customer number) in order to guarantee number portability. Elisa processes the Data Subject's Personal Data, identifiable data (e.g. number of the identity document and facial image), contact details (e.g. contact address), invoicing data (e.g. invoicing address) in order to prepare and enter into Mobile ID contracts. Elisa may process all of the Data Subject's Personal Data in order to respond to state authorities, depending on the query of the authority.

### 3.4. DISCLOSURE AND TRANSFER OF PERSONAL DATA TO THIRD PARTIES

3.4.1. Elisa discloses Personal Data to third parties only to the extent necessary for achievement of the objectives specified in clause 3.3.

3.4.2. Elisa discloses or transmits Personal Data to:

3.4.2.1. the contractual (authorised persons) or legal representative (guardians) of the Data Subject;

3.4.2.2. on the basis of the Data Subject's request, another Controller (e.g. upon implementation of the right to transmit data);

3.4.2.3. data processing registers (e-Krediidiinfo in the case of debts, the number booking database (NBA) in the case of number portability).

3.4.2.4. Elisa's Processors: - service distributors

- call centres (answering the calls of customers)
- service partners (sending out satisfaction questionnaires)
- device maintenance centres (maintenance and repairs of the devices of customers)
- suppliers (delivery of cards and devices required for contracts and the use of services)
- invoice centres (preparation and issue of invoices)
- roaming partners (resolution of the issues and complaints of Customers)
- marketing partners (sending out advertising offers)
- archiving centre (archiving contracts and other documents associated with contracts)
- debt collectors
- managers and developers of data processing systems
- subcontractors (construction of communications structures), only the Personal Data of Partners are sent
- other Controllers (certification service providers, insurance companies, special rate and M-payment service providers)
- when assigning claims to a new creditor

3.4.2.5. **other Controllers** (e.g. certification service providers, insurance companies, special rate and M-payment service providers) **for the performance of contracts**

3.4.2.6. **State authorities:**

- investigative bodies, surveillance authorities, the Prosecutor's Office and courts pursuant to the Code of Criminal Procedure
- security authorities
- the Data Protection Inspectorate, the Financial Supervision Authority, the Environmental Inspectorate, the Police and Border Guard Board, the Security Police Board and the Tax and Customs Board pursuant to the Code of Misdemeanour Procedure
- the Financial Supervision Authority pursuant to the Securities Market Act
- the court pursuant to the Code of Civil Procedure

- the surveillance authority in the cases stipulated in the Defence Forces Organisation Act, the Taxation Act, the Police and Border Guard Act, the Weapons Act, the Strategic Goods Act, the Customs Act, the Witness Protection Act, the Security Act, the Imprisonment Act and the Aliens Act
- to surveillance and security authorities and their supervisory authorities and the court pursuant to the Electronic Communications Act
- in the cases arising from other legislation on the grounds and pursuant to the procedure stipulated therein

### **3.5. RIGHTS OF DATA SUBJECT**

- 3.5.1.** The Data Subject has the right to review the information specified in Articles 15(1) and (2) of the Regulation.
- 3.5.2.** Elisa will make the information specified in Articles 15(1) and (2) of the Regulation accessible to the Data Subject via this document and the self-service environment.
- 3.5.3.** The Data Subject has the right to demand correction of Personal Data.
  - 3.5.3.1. The Data Subject can correct the data themselves in the self-service environment or on the basis of a request.
- 3.5.4.** The Data Subject has the right to have their Personal Data deleted (“the right to be forgotten”).
- 3.5.5.** The Data Subject has the right to restrict the processing of their Personal Data.
- 3.5.6.** The Data Subject has the right to receive information about the Personal Data concerning them that they have submitted to the Controller and the right to send these data to another controller (the right to transfer data).
- 3.5.7.** The Data Subject has the right to file objections at any time to the processing of their Personal Data, which is necessary in the case of legitimate interest, including in respect of Profiling based on legitimate interest.

### **3.6. RETENTION OF PERSONAL DATA**

- 3.6.1.** Elisa retains Personal Data for as long as necessary for the purposes of processing, but no longer than the limitation period required by law.
- 3.6.2.** Elisa retains video recordings according to the Surveillance Policy.
- 3.6.3.** Elisa retains call recordings according to the Policy for Processing Call Records.
- 3.6.4.** Elisa retains service and location data according to the Electronic Communications Act.
- 3.6.5.** If Elisa wants to retain personal data for longer than is necessary for the purposes of the collection of data, Elisa anonymises the personal data in such a way that the Data Subject can no longer be identified.
- 3.6.6.** Elisa retains the Personal Data processed on the basis of consent until the consent is withdrawn.

### **3.7. EXERCISE OF RIGHTS AND SUBMISSION OF REQUESTS**

- 3.7.1.** A request for the correction, deletion, transfer or restriction of data processing or an objection to processing must be signed and sent to a point of sale of Elisa or digitally signed and e-mailed to [andmekaitse@elisa.ee](mailto:andmekaitse@elisa.ee). **In order to transfer the Personal Data concerning the Data Subject, the Data Subject must fill in a request that can be found [here](#).**
- 3.7.2.** Elisa will respond to the requests and objections filed by the Data Subject **within one month of receipt of the request or objection**. Said period may be extended **by two months** if necessary, considering the complexity and quantity of the requests or objections. Elisa will notify the Data Subject of the extension of the response deadline and the reasons for the delay within a month of receiving the request or objection. If the Data Subject submits the request or objection electronically, the response will also be sent electronically, unless otherwise requested by the Data Subject.
- 3.7.3.** Elisa has the right to reject the Data Subject's request to exercise their rights if Elisa cannot identify the Data Subject (e.g. in the case of Prepaid Card Users).
- 3.7.4.** If Elisa does not implement measures according to the Data Subject's requests and objections, Elisa will notify the Data Subject of the reasons for not taking the measures within one month of receiving the request or objection and explain the option to file a complaint with the supervisory authority and use legal remedies.
- 3.7.5.** The Data Subject has the right to file a complaint with Elisa, the Data Protection Inspectorate or a court if the Data Subject finds that their rights have been breached upon Personal Data processing. The contact details of the Data Protection Inspectorate (hereinafter referred to as the DPI) can be found on the website of the DPI at [www.aki.ee](http://www.aki.ee).

## **4. MISCELLANEOUS**

- 4.1.** Elisa has the right to update, clarify and amend this Data Protection Policy at any time based on changes in legislation, telecommunications practices and the services provided by Elisa.
- 4.2.** This Privacy Policy will enter into force on 31 October 2019.