**PRIVACY POLICY FOR THE APPLICATION MTEL MK**

The company for trade and services MTEL DOOEL Skopje , st. Maksim Gorki No. 11/1-3 collects and processes personal data of users/subscribers in accordance with the Law on Personal Data Protection (" Official Gazette of North Macedonia" No. 42/2020 and 294/2021)

For the needs of **the application** **MTEL MK** , the company for trade and services MTEL DOOEL Skopje processes the personal data of users/subscribers in accordance with this Privacy Policy, as well.

This Privacy Policy explains in a clear, understandable and easily accessible way which personal data is collected and processed by the Company for Trade and Services MTEL DOOEL Skopje , for the needs of the **application MTEL MK**, as data controller (hereinafter: MTEL DOOEL Skopje) :

***Personal data***

1. When using **the application** **MTEL MK** , MTEL DOOEL Skopje collects and processes the following personal data from the users/subscribers of the services: **name, surname** and **telephone number.**

***Legal basis***

1. Legal basis for processing personal data for use of **the application** **MTEL MK** , is the registration as user of **the application** , which is considered as **a statement of consent.**

***Access parameters***

1. To use the **application** **MTEL MK**, the user enters the phone number , after which **he confirms** that the entered phone number is his. After his confirmation, he receives **a code** via sms, which he enters in the empty fields for **verification** . The next field is **"Let's get to know each other"**, where the user enters his first and last name , after which he enters the **"Tariffs" field,** where the user has the opportunity to choose tariff extras that are currently offered through this **application.** The next field is **"My order"** where " Monthly subscription overview " and "Additional charges" are given. Next field is the **"Services"** where the user can activate: " Call on hold" which allows the user, if someone tries to reach him while he is talking, to hear a signal that another call is waiting, "top up pre-paid credit ", i.e. the possibility to top up credit for another and "Internet settings" for the user to download the settings and connect.
2. Starting from the activation of the services, it is considered that all actions performed through the access parameters are performed by the user or with his consent, so the user is fully responsible for all consequences caused by such actions. Thereby, the user is obliged to prevent their use by unauthorized persons.

**Method of data collection and transparency**

1. Personal data (phone number and first and last name) are collected directly from the user when signing up/registering on the **application MTEL MK**. Without them, the user cannot use **the application** .
2. When installing the **application** **MTEL MK** and registering for use, **through this Privacy Policy** the useris informed about data processing, in accordance with the Law on Personal Data Protection (Official Gazette of North Macedonia No. 42/2020 and 294/2021), whereby the user **gives his consent** – he ticks the box in front of the statement that he agrees with this Privacy Policy.

**Volume of data being processed**

1. MTEL DOOEL Skopje processes personal data for purposes that are specifically determined, explicit and justified. When receiving data, MTEL DOOEL Skopje complies to the principle of minimum volume of data, so only those data that are necessary to fulfill the purposes for which they are processed are collected from the persons to whom the data refer. Additional personal data is collected and processed only based on the prior consent of the person to whom the data refers. This is also the case when using the **application** **MTEL MK** .

**Purpose of processing**

1. MTEL DOOEL Skopje ensures that the data will be processed in accordance with the purpose of processing, and the purpose for which it is processed is the use of the services and benefits offered by **the application** **MTEL MK** .

**Access to personal data**

1. Only the employees of MTEL DOOEL Skopje have access to the personal data, as well as the hired associates in accordance with the work tasks they perform on the basis of previously provided technical, organizational and personnel measures foreseen by the internal policies.
2. Personal data is available to third parties only in the following cases:

* If there is a legal obligation or express authorization based on law (request of competent state authority or court),
* If a processor is hired to perform individual actions, and based on a contractual relationship,
* To the affiliated companies of MTEL DOOEL Skopje, provided that there is a legal basis for such transfer (consent or legitimate interest).

**Method of storage, confidentiality and data protection**

1. Personal data processed for use of the **application MTEL MK**, is stored by MTEL DOOEL Skopje in electronic form.
2. In order to protect personal data, MTEL DOOEL Skopje implements organizational, technical and personnel measures foreseen by the internal policies.

**Users of the data (according to the definition of a user in the Law on Personal Data Protection)**

1. MTEL DOOEL Skopje is authorized to forward the personal data that is being processed in the **application MTEL MK** to the judicial, investigative, security authorities and other state authorities (courts, prosecutor's office, etc.) and holders of public authorizations, who process personal data. in accordance with the regulations or for the purpose of exercising their authorization.
2. MTEL DOOEL Skopje is authorized to forward personal data, in order to exercise rights from the contract, to lawyers, debt collection agencies, courts, executors, in proportion to the purpose of the processing, in accordance with the regulations and in compliance with the limitations prescribed by the regulations .

**User/subscriber rights**

1. The user/subscriber whose data is processed within the **application MTEL MK** has the following rights:
   1. Right to access to personal data ,
   2. Right to rectification of personal data ,
   3. Right to erasure ( right to be forgotten ),
   4. Right to restriction of processing,
   5. Right to objection,
   6. Right to submit a request for violation of the Law on Personal Data Protection to the Personal Data Protection Agency.
   7. The right to withdraw his consent for processing of his personal data in **the application** **MTEL MK,** through the Contact Center,by calling the phone number 15010, in which case the user can not use **the application** **MTEL MK** in the future.
2. In order to protect their rights in relation to the processing of personal data within the **application** **MTEL MK**, the user can write directly to the data protection officer of MTEL DOOEL Skopje at the e-mail address: ozlp@mtel.mk
3. All applications must be legibly and neatly completed and signed. Requests for exercising rights are published at the following link: [Microsoft Word - Baranja za ostvaruvanje na vasite prava (mtel.mk)](https://mtel.mk/wp-content/uploads/2022/03/Baranja-za-ostvaruvanje-na-vasite-prava.pdf)
4. MTEL DOOEL Skopje will respond to the request without delay, no later than within 30 days from the day of receipt of a complete and correct request, and in case the request is complex, no later than within 3 months, whereby before the end of the first month, the user will be informed about the extension of the deadline for responding to the request, which is in accordance with the Law.

**Acceptance and start of validity of this privacy policy**

1. With your statement that you agree with this Privacy Policy, when signing up/registering as a user of **the application** **MTEL MK** , you confirm that you have read, understood and accepted the processing of personal data described above.
2. This Privacy Policy may be updated periodically, but so that the achieved level of privacy protection will not be reduced.
3. This Privacy Policy shall be valid from 01.09.2024.