

Notice concerning the protection of your personal data

This document is a Description of the Processing of your Personal Data by POST.

GENERAL DESCRIPTION

DEFINITIONS

"Description(s)": the General and/or Specific Description;

"General Description": general overview of the Processing of your Data by POST in the context of its customer relationships;

"Law": all laws, regulations and other requirements applicable in the Grand Duchy of Luxembourg, in particular relating to Data protection, the protection of privacy, electronic storage, confidentiality or Personal Data, including the General Data Protection Regulation (Regulation EU 2016/679) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data;

"Notice": the General Description and, where appropriate, the Specific Description(s);

"Personal Data" or "Data": your personal data, as defined by Law and processed by POST (e.g. name, address [physical and email], telephone number, account number, etc.);

"POST": POST Telecom S.A. is a public limited company under Luxembourg law, with its registered office at 1, rue Emile Bian, L-1235 Luxembourg, registered in the Luxembourg Trade and Company Register under number B43290;

"Processing": any operation or set of operations defined by Law, that is performed on your personal data, whether or not by automated means (e.g. collection, recording, organisation, consultation, use, destruction);

"Specific Description": detailed overview of the Processing carried out by POST, supplemented, where appropriate, by a contract, terms and conditions, a subscription form or any other document identified as such or with unambiguous characteristics;

"You" or "your": any POST customer within the meaning of the POST General Terms and Conditions of Sale (non-business customers).

PROCESSING OF YOUR DATA

According to the type of product or service, POST processes some of your Data that has been directly collected from you and/or results from the conclusion of a contract between you and POST. It is possible, however, that POST, within legal limits, may use other Data sources via POST subsidiaries, external partners or public sources (e.g. directories).

POST processes your Data in the capacity of Data Controller in order to:

- (i) ensure the performance and efficient management of the contract (e.g.: billing, support, improving the service);
- (ii) comply with legal and regulatory obligations (e.g.: prevention of money laundering and terrorist financing);
- (iii) pursue the legitimate interests of POST or third parties (e.g.: prevention, investigation and prosecution of offences, direct marketing including profiling or adaptation of the offer of POST to your needs, when your consent is not legally required);

(iv) undertake statistical studies.

Failure to provide POST with certain Data, or requesting its deletion, may result in it not being possible to provide you with the product or service in question, or to ensure the expected quality.

In the context of certain Processing, POST will also be required to request your consent, which may subsequently be amended upon a mere request from you.

Your Data is:

- (i) communicated to companies of the POST group, its subcontractors, administrations, competent authorities, intermediaries and other providers and/or to third parties in the context of the purposes set out in the Descriptions;
- (ii) processed by POST, its partners and by any other entity or company of the POST group, for the purposes of marketing and/or commercial promotion of its products and services:
 - a. in a general or
 - b. targeted manner, if:
 - your consent (where required by Law) has been obtained beforehand;
 - you have not notified your objection to such direct marketing.

POST records its telephone and electronic communications with you, notably in order to be able to provide evidence of commercial transactions or communications, for example in the event of complaints or disputes.

Your Data is kept for as long as:

- (i) necessary, within the framework of the purposes specified in the Description(s), and/or
- (ii) is imposed by the applicable legislation, it being specified that according to the Law, POST has a legal obligation to store the data and contracts of its customers for a period of ten (10) years. For Data processed exclusively for the purposes of marketing and/or commercial promotion, the storage period is three (3) years from the end of the commercial relationship.

YOUR RIGHTS

- Within the limits imposed by Law, you have the right at any time to access and rectify your Data and, where applicable, the right to request its erasure (the 'right to be forgotten') or restricted processing, or to object.
- You have the right to receive the Data that you have provided to POST in a structured format and to transmit such Data to a third party, except where this right adversely affects the rights and freedoms of third parties.
- Except for cases otherwise provided for in Law, you also have the right not to be the subject of a decision that is based solely on automated Processing, including profiling, and which produces legal effects that concern you or affect you significantly in a similar way.

In order to exercise any one of these rights you may submit your request to POST, together with a two-sided copy of a document proving your identity, to the following address: privacy@post.lu

You may also address your complaints to the Commission Nationale pour la Protection des Données (CNPD - National Commission for Data Protection), via their website: www.cnpd.lu

SPECIFIC DESCRIPTION

This document is a Specific Description of the Processing of your Data by POST, in the context of its provision of services. This document may be subject to amendments, of which you will be notified, whenever this is required by Law.

PURPOSES

The underlying **purposes** served by the Processing of your Data by POST are as follows:

Purposes	Description
Customer management and support	<ul style="list-style-type: none"> ✓ Customer case management ✓ Quality control for the products & services provided ✓ Accounting and billing of products & services ✓ Portability management ✓ Customer satisfaction monitoring ✓ Customer support (Help Desk, Hotline, etc.) ✓ Direct marketing & targeted advertising ✓ Business development (including profiling)
Business development	<ul style="list-style-type: none"> ✓ Acquisition of new customers
List of Professional Customers from the Financial Sector (PSF) to provide to the CSSF	<ul style="list-style-type: none"> ✓ Legal obligation for a PSF accreditation report
Supplier management	<ul style="list-style-type: none"> ✓ Supplier administration, management and support ✓ Supplier accounting
Dispute management	<ul style="list-style-type: none"> ✓ Recovery of unpaid bills, disputes
Management of IT and communications infrastructure	<ul style="list-style-type: none"> ✓ Supervision of infrastructure ✓ Traffic control
Service usage statistics	<ul style="list-style-type: none"> ✓ Service usage behavioural analyses
Management of infrastructure security	<ul style="list-style-type: none"> ✓ Access control, management of computer protection systems, monitoring of activity on infrastructure

TRANSMISSION

In the context of POST activities and within the limits of the purposes described above, your Data may, depending on your use of POST services, be **transmitted to or be accessible by**:

- resellers and commercial partners,
- IT and telecommunications service providers,
- communications service providers,
- billing services providers and, where applicable, debt recovery providers,
- transport service providers,
- companies in the POST Luxembourg group, as part of sales prospecting or related services,
- the competent authorities (in particular the CSSF and the Institut Luxembourgeois de Régulation - ILR).