



Notice concerning the protection of your personal data

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

DEFINITIONS

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

"General Description": the 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 the protection of natural persons with regard to the processing of Data, including the General Data Protection Regulation (Regulation EU 2016/679);

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

"Partner": any company that has concluded a partnership agreement with POST Courier allowing access to all or part of a POST Courier service and/or allowing certain operations to be performed;

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

"POST": POST Courier, the postal services division of POST Luxembourg, a public body established by the Law of 10 August 1992, as further modified, having its registered office at 20, rue de Reims, L-2417 Luxembourg, registered with the Luxembourg Trade and Companies Register under number J28;

"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": the 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.

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 for:

- (i) the performance and efficient management of the contract (e.g.: billing, support, improving the service);
- (ii) compliance with legal and regulatory obligations (e.g.: prevention of money laundering and terrorist financing);
- (iii) the pursuit of 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) 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 are:

- (i) communicated to companies of the group POST, its subcontractors, Partners, 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 group POST, 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 may record 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 postal 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
Distribution of letters and packages	<ul style="list-style-type: none"> ✓ As part of its global service mission, the collection and updating of residential addresses and post office boxes ✓ Services for the receipt and dispatch of packages via 24-hour machines or partner points (and online services) ✓ Bulk distribution of newspapers and magazines
Management of registered mail (registered letters, packages)	Management and tracking of mail across each stage of its route and its distribution, including its traceability
General customer management and support	<ul style="list-style-type: none"> ✓ Identification of the customer in accordance with the Law and CSSF regulations, including KYC (Know Your Customer) ✓ POST Courier customer management and support for postal operations (distribution of letters, packages and other services), the provision of products and services, including archiving ✓ Management of product orders for customers (including online) ✓ Production of business, quality monitoring and service performance reports ✓ Business development for existing customers (including profiling), direct marketing and personalised advertising
Management of stamp customers	<ul style="list-style-type: none"> ✓ Customer management and support based on purchases, commercial transactions or other professional relationships ✓ Business development for existing customers (including profiling), direct marketing and personalised advertising
Management of personalised services	Provision and monitoring of online personalised postcard and stamp services
Management of public relations and events	<ul style="list-style-type: none"> ✓ Institutional communication on postal services ✓ Communication on POST Philately initiatives, attendance at exhibitions and fairs
Management of customer risk profiles	<ul style="list-style-type: none"> ✓ Determining customer risk profiles ✓ Cooperation with the authorities ✓ Legal obligations with regard to the prevention of money laundering and fraud

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:**

- traders,
- payment initiation service and/or account information providers, provided that the latter have obtained your consent for the provision of their services,
- IT and telecommunications service providers,
- the competent authorities (in particular the Institut Luxembourgeois de Régulation - ILR).