



## Notice concerning the protection of your personal data

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

### GENERAL DESCRIPTION

#### 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 personal 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 Finance allowing access to all or part of a POST Finance service and/or allowing certain operations to be performed;

"**Personal Data**" or "**Data**": your personal data and/or that of people 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 Finance, the postal financial services division of POST Luxembourg, a public body established by the Law of 10 August 1992, as amended, 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, which 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. 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).

The legal grounds on which POST processes your data in the capacity of Data Controller are:

- (i) the performance and efficient management of the Contract between you and Post (e.g.: billing, support and improving the service) or the performance of pre-contractual measures taken at your request;
- (ii) compliance with the legal and regulatory obligations to which POST is subject (e.g.: prevention of money laundering and the financing of terrorism);
- (iii) the pursuit of legitimate interests of POST or third parties (e.g. prevention of fraud, investigation and prosecution of offences, direct marketing including profiling or adaptation of the POST offer to your needs);
- (iv) your consent, within the context of certain Processing purposes, which may subsequently be withdrawn by simple request from you.

Depending on the purpose pursued, POST may process the following categories of Personal Data concerning you:

- Standard identification data (surname, name, postal address, telephone number, identity document, etc.);
- Data relating to personal characteristics (marital status, nationality, date and place of birth, family situation, household composition, profession, etc.);
- Electronic identification data (email, IP address, login/password, cookies, etc.);

- Banking data (RIB, IBAN, BIC, bank card data, KYC data, transactions, etc.);
- Ticketing Data (telephone assistance, support, complaints, etc.);
- Data linked to your activity interacting with the products and services of POST (transaction histories, pages visited on Internet websites and POST mobile applications, etc.);
- geolocalisation data.

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.

Your Data is:

- (i) communicated to companies of POST group, 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 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 is likely to 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.

## THE SECURITY OF YOUR DATA

POST implements appropriate and reasonable security measures in the light of identified risks, with a view to protecting your Personal Data from destruction, loss, alteration, unauthorised disclosure or access and all other unlawful forms of processing.

All employees and processors of POST who have access to your Personal Data are bound by a strict obligation of confidentiality and are obliged to respect the security of your personal Data. They shall have access only to the Data they require in order to perform their tasks.

## YOUR RIGHTS

Within the limits and conditions imposed by Law, you have the following rights, at any time:

- to request access to the Data held by POST about you;
- to request its rectification if it is inaccurate or incomplete and its erasure if it is obsolete;
- to oppose the processing of your data on legitimate grounds;
- if the preconditions have been met, to request restricted Processing of your data or its permanent erasure (the 'right to be forgotten');
- to ask to receive the Personal Data that you have provided to POST in a structured format and to transmit this Data to a different Data Controller, except where this right adversely affects the rights and freedoms of third parties;
- except for cases otherwise provided for in law, to request 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 significantly affect you 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](mailto: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 its website: [www.cnpd.lu](http://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 financial 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
<b>Comprehensive service management</b>	<ul style="list-style-type: none"> <li>✓ All processes associated with the account management: opening, closure, management authorisation, reconciliation, etc.</li> <li>✓ Performance of payment transactions and financial transactions</li> <li>✓ Recording and returning deposits</li> </ul>
<b>Comprehensive customer management</b>	<ul style="list-style-type: none"> <li>✓ Identification of the customer in accordance with the Law and CSSF regulations, including KYC (Know Your Customer)</li> <li>✓ Customer care concerning provision of the products and services, including archiving</li> <li>✓ Customer processing on the basis of commercial transactions</li> <li>✓ Business development for existing customers (including profiling), personalised marketing</li> </ul>
<b>Management of automatic teller machines</b>	<ul style="list-style-type: none"> <li>✓ Administration and management of automatic teller machines allowing cash withdrawals or deposits</li> </ul>
<b>Management of payment instruments (online/mobile in particular)</b>	<ul style="list-style-type: none"> <li>✓ Management and administration of credit and debit cards, and related services (credit, creditworthiness, etc.)</li> <li>✓ Payment authorisation</li> <li>✓ Management of 3D Secure system</li> <li>✓ Provision of mobile payment applications</li> <li>✓ Online Banking</li> <li>✓ Management of online payments</li> <li>✓ Communication to service providers of payment initiation and/or information on the accounts, information required concerning your Account for the processing of transactions that you initiate with them</li> </ul>
<b>Management of customer risk profiles</b>	<ul style="list-style-type: none"> <li>✓ Determining customer risk profiles</li> <li>✓ Monitoring transactions and operations carried out to identify unusual behaviour</li> <li>✓ Preventing and detecting fraud</li> <li>✓ Cooperation with the authorities with regard to combating money laundering and the financing of terrorism</li> </ul>

### CATEGORIES OF DATA RECIPIENTS

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 the following categories of recipients:

- manufacturers of credit and debit cards,
- companies in charge of managing the dedicated portal and the codes needed to activate the 3D Secure service or a similar service and to validate 3D Secure transactions or similar transactions,
- providers of the services necessary for payments made via POST services and other bodies responsible for managing VISA cards (including Easy Visa) and compensation and authorisations relating to them,
- payment initiation service and/or account information providers, provided that the latter have obtained your consent for the provision of their services,
- the competent authorities.

POST Finance also uses third parties, authorised by Law to fulfil its anti-money laundering ('AML') and fraud prevention obligations. This means that, in the context of compliance with its AML obligations, POST may collect some of your Data from an authorised third party, such as another financial institution or a professional in the financial sector specialised in linking such data between financial institutions. Conversely, POST is authorised to pass on your Data to other entities subjected to AML legislation, so that they may fulfil their obligations under that legislation.

When you ask POST to execute a Payment Order, you understand that your Data, as required for proper execution of the transaction, may be processed outside the European Union.