



Notice concerning the protection of your personal data

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

GENERAL DESCRIPTION

INTRODUCTION

POST attaches great importance to respecting your privacy and is aware of the importance that you attach to it. POST will make every effort to enable you to use its services in full confidence, notably by processing your personal data transparently, in strict observance of the applicable data protection laws and regulations and according to your personal preferences.

DEFINITIONS

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

"**General Description**": a 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);

"**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 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, that is performed on your personal data, whether or not by automated means (e.g. collection, recording, organisation, consultation, use, destruction);

"**Specific Description**": a 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

Depending on the type of product or service delivered, 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 its capacity as Data Controller are:

- (i) the performance and efficient management of the Contract between you and POST (e.g. invoicing, 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 (e.g. prevention of fraud, investigation and prosecution of offences, statistical studies 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 (e.g. direct marketing, including profiling and commercial prospecting).

TYPE OF DATA COLLECTED

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.

STORAGE OF YOUR DATA

Your Personal Data, collected and processed by POST, will only be stored for as long as is strictly necessary for the purpose of the intended processing or to comply with a legal obligation imposed under the applicable legislation. Therefore, POST will store data as follows:

- for a maximum of 3 (three) years from the end of the commercial relationship or the last contact, in the case of Data processed for the purposes of commercial prospecting, marketing actions or promotion of the offers of POST, its subsidiaries and its external partners;
- for a maximum of 10 (ten) years from the end of the commercial relationship, in the case of Data relating to contractual aspects (contracts, guarantees, claims, collection & litigation, etc.) or accounting (invoices, purchase orders, delivery notes, etc.).

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

To the extent that POST processes your Personal Data, you have the following rights at all times and within the limits set by the Law:

- to access your personal data (to know what data has been collected and processed and to obtain a copy);
- to request its rectification if it is inaccurate or incomplete and its erasure if it is obsolete;
- to object to your data being processed for a legitimate reason (including for the purposes of commercial prospecting);
- if the preconditions have been met, to request restricted Processing of your data or its permanent erasure (right to be forgotten);
- to ask to receive the personal Data that you have provided to POST in a structured format (portability) and to transmit this Data to a different Data Controller, except where this right adversely affects the rights and freedoms of third parties;
- to request not to be the subject of a decision that is based solely on automated processing, including profiling, where this decision produces legal effects that concern you or significantly affect you in a similar way. You can also ask for clarification of the rationale behind this automated processing, in order to be able to challenge it and request that it be reviewed by a natural person;
- to withdraw your consent at any time for all processing based on said consent.

In order to exercise any one of these rights you may submit your request to POST, free of charge, together with a copy of a document proving your identity (both sides):

- by email at the following address: privacy@post.lu
- or by post to: POST Luxembourg – DPO, 20 rue de Reims, L-2417 Luxembourg

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

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
Comprehensive service management	<ul style="list-style-type: none"> ✓ All processes associated with Account management: opening, closure, management authorisation, reconciliation, etc. ✓ Performance of Payment Transactions and financial transactions ✓ Registration and return of deposits
Comprehensive customer management	<ul style="list-style-type: none"> ✓ Identification of the customer in accordance with the Law and CSSF regulations, including KYC (Know Your Customer) ✓ Customer care concerning provision of the products and services, including archiving ✓ Customer processing on the basis of commercial transactions ✓ Prospecting for existing customers, direct marketing and personalised advertising (including profiling) ✓ Behavioural statistical studies
Management of automatic teller machines	<ul style="list-style-type: none"> ✓ Administration and management of automatic teller machines allowing cash withdrawals or deposits
Management of payment instruments (online/mobile in particular)	<ul style="list-style-type: none"> ✓ Management and administration of credit and debit cards, and related services (credit, creditworthiness, etc.) ✓ Payment authorisation ✓ Management of the 3D Secure system ✓ Provision of mobile Online Banking and/or payment applications ✓ Online Banking ✓ Management of online payments ✓ Communication to service providers of payment initiation and/or information on the accounts, information required concerning Accounts, for the processing of transactions that the customer initiates with them
Management of customer risk profiles	<ul style="list-style-type: none"> ✓ Determining customer risk profiles ✓ Monitoring transactions and operations carried out to identify unusual behaviour ✓ Preventing and detecting fraud ✓ Cooperation with the authorities with regard to combating money laundering and the financing of terrorism

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,
- subsidiaries of the POST group and its commercial partners, provided that you have given your consent to receive offers from them.

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.