



Notice concerning the protection of your personal data

This document is a description of the processing carried out on your personal data by POST

INTRODUCTION

POST values your privacy and knows how important it is to you. 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

"Law" means all laws, regulations and other requirements applicable in the Grand Duchy of Luxembourg, relating to the protection of natural persons with regard to the processing of data, including the General Data Protection Regulation (Regulation EU 2016/679);

"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;

"You" or **"your"** or **"yours"** means any natural person benefiting from and/or ordering a product and/or service provided by POST, whether for themselves or the legal entity they represent, where applicable.

Terms defined in EU Regulation 2016/679 that appear in this notice shall be understood as in that Regulation.

POST'S ROLE IN PROCESSING YOUR DATA

POST acts as the data controller for all personal data used and necessary for the processing described below, in order to provide you with postal financial services.

TYPE AND SOURCE OF DATA COLLECTED

Depending on the intended purpose, POST may process the following categories of personal data relating to you:

- Basic identifying information, such as your full name, date and place of birth, postal address, email address, telephone numbers, identification, etc.
- Electronic identification data, such as the IP address of your computer, the date & time of your connection, pages visited, browser details (type, language, etc.) and computer details (type, resolution, etc.), your login/password details, cookies, etc.
- Personal life data, such as your marital status, family situation, household composition, lifestyle, occupation, etc.
- Bank data, such as your account number, your IBAN, identification data of your means of payment, your transactions, etc.
- Ticketing data regarding your interactions with POST customer services, such as telephone assistance requests, support requests, complaints, etc.
- Data related to your activity in interacting with POST products and services, such as your transaction history, pages visited on POST websites and mobile applications, etc.
- Geographical location data (geolocation).

Personal data processed by POST is mainly collected directly from you.

However, POST may also collect certain personal data about you indirectly from the following sources:

- Another financial institution, a financial sector professional specialising in linking such data between financial institutions, in order to fulfil its obligations in terms of customer identity verification (KYC - *Know Your Customer*), fraud prevention and anti-money laundering (AML - *Anti Money Laundering*).

- Service providers specialising in the management of documents required to meet legal identification obligations (KYC) when you have consented to them being shared among professionals in the financial sector.

In the event that the data collected is not essential for the provision of the service, POST will clearly inform you at the time of collection which data is essential and which is optional.

PROCESSING PERFORMED BY POST FOR THE PROVISION OF ITS SERVICES

Purposes	Description of processing	Legal basis
Comprehensive financial services management	All processes associated with account management: opening, closure, management authorisation, reconciliation, etc. Performance of payment transactions and financial transactions Registration and return of deposits	Performance of a contract
Business development	Prospecting from existing customers	Legitimate interest
	Acquisition of new customers Direct marketing and personalised advertising (including profiling)	Consent
Customer management and support	Customer identification (KYC - <i>Know Your Customer</i>)	Legal obligation
	Customer care concerning provision of the products and services, including archiving Customer processing on the basis of commercial transactions Telephone support, complaints management and after-sales service management, satisfaction surveys	Performance of a contract
	Production of business, quality monitoring and service performance reports, statistical and behavioural studies	Legitimate interest
Management of automatic teller machines	Administration and management of automatic teller machines allowing cash withdrawals or deposits	Legitimate interest
Management of payment instruments	Management and administration of credit and debit cards, and related services (credit, creditworthiness, etc.) Payment authorisation, 3D Secure system management Management of online payments Provision of payment applications Eboo online banking service (Internet and/or mobile) Communication to service providers of payment initiation and/or information on accounts, information required concerning accounts, for the processing of transactions that the customer initiates with them	Performance of a contract
Management of customer risk profiles	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	Legal obligation

OTHER PROCESSING NECESSARY FOR THE PROVISION OF THE SERVICES

Purposes	Description of processing	Legal basis
Dispute management	Management of the collection of unpaid debts, disputes and follow-up of disputes	Legitimate interest
Management of IT infrastructure security	Detection, prevention and fight against threats to IT and communications infrastructures Protection of personal data Cybersecurity	Legitimate interest
Management of the physical safety of goods and people	CCTV resources implemented to monitor: <ul style="list-style-type: none"> • Access to counters, premises and buildings • Sensitive equipment (computer servers, ATMs, etc.) 	Legitimate interest
Management of requests to exercise rights	Logging, processing and response to your requests to exercise rights in application of Articles 12 to 23 of the GDPR	Legal obligation

CATEGORIES OF RECIPIENTS OF YOUR DATA

Within the framework of POST's activities and within the limits of the purposes described above, your data may, depending on your use of POST's services, be communicated 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,
- service providers specialising in the management of identification documents necessary to meet KYC legal obligations,
- other entities subject to AML legislation, for the performance of their obligations under this legislation,
- 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.

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. In particular, POST will store data:

- a maximum of 6 months from the date of registration of the data by POST, for data processed for the purposes of traceability, security or proper functioning of computer applications and networks.
- a maximum of 3 years from the date of data collection by POST or of your last contact with POST, for data processed for commercial prospecting purposes.
- a maximum of 3 years from the end of your commercial relationship with POST, for data processed for the purposes of marketing and/or the promotion of offers provided by POST, its subsidiaries and its external partners
- a maximum of 10 years from the end of your commercial relationship with POST, for data relating to contractual matters (contracts, guarantees, claims, collection & litigation, etc.) or accounting matters (invoices, purchase orders, delivery notes, etc.).

YOUR DATA SECURITY

POST implements security measures that are appropriate and reasonable to the risks presented by the processing, in order to protect your personal data against destruction, loss, alteration, unauthorised disclosure or access and any other form of unlawful processing.

All POST employees and contractors who have access to your personal data in the course of performing their duties are required to maintain strict confidentiality and comply with the security rules applicable to your personal data. They may only access data they need to perform their duties and are regularly made aware of or trained on applicable compliance and security rules.

The security measures applied to our IT and communication infrastructures are periodically checked and tested by our CyberForce POST experts.

Furthermore, in the event of a personal data breach that would pose a risk to your rights & freedoms, POST is committed to complying with the obligation to notify such personal data breaches to the CNPD (Luxembourg National Commission for Data Protection).

TRANSFERRING YOUR DATA OUTSIDE THE EU

Your personal data is primarily processed by POST in Luxembourg. In some cases, processing may also take place in another Member State of the European Union (EU) or the European Economic Area (EEA).

In addition, when you request POST to execute a payment order, the personal data necessary for the proper execution of the transaction may be processed outside the European Union.

YOUR RIGHTS

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

- to be informed about the processing of personal data carried out by POST relating to you;
- to access your personal data (to know what data has been collected and processed and to obtain a copy);
- to request its correction if it is inaccurate or incomplete and its deletion 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 are met, to request restricted processing of your data or its permanent deletion (right to be forgotten);
- to ask to receive a copy of 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.

You may exercise any of these rights free of charge by contacting DPO POST:

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

In order for us to satisfy your request and to avoid any identity theft, a copy of both sides of a valid ID may be required.

POST undertakes to respond within one month of receiving your duly completed application.

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