

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 – **"GDPR"**);

"POST" means POST Telecom S.A., 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;

"You" or **"your"** means any customer within the meaning of the POST General Terms and Conditions of Sale.

Terms beginning with a capital letter that are not defined in this notice are those defined in the POST Telecom General Conditions of Sale and have the same meaning. The terms defined in EU Regulation 2016/679 that appear in this notice shall be understood as used in that Regulation.

POST'S ROLE IN PROCESSING YOUR DATA

POST acts in the capacity of data controller for all personal data used and necessary for the processing described below, in order to provide you with the services associated with its status as a telecommunications and/or electronic communication services operator.

However, POST shall not be deemed responsible for the processing of personal data contained in the electronic communications themselves. The person at the origin of the electronic communication shall be deemed to be the controller of the personal data contained in the communications that he/she generates.

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 and identification.
- 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 and cookies.
- Personal data, such as your marital status, family situation, household composition, lifestyle and occupation.
- Bank data such as your account number, your IBAN, identification data of your means of payment and your transactions.
- Data regarding your interactions with POST customer services, such as telephone assistance requests, support requests and complaints.
- Data relating to your activity in interacting with POST products and services, such as your transaction history, consumer information and pages visited on POST websites and mobile apps.
- Geographical location data (geolocation).
- Images or videos in the context of CCTV coverage of the points of access to our shops, premises and buildings.

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

However, depending on the service to which you have subscribed, POST may also collect certain personal data about you indirectly from the following sources:

- By purchasing files from third party organisations with whom you may have a relationship, if you have previously consented to share your data with these organisations.

- From POST Finance and POST Courier, regarding operational Customer identification processes.
- By using files from "Open Data".

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

PROCESSING PERFORMED BY POST FOR THE PROVISION OF ITS SERVICES

Purposes	Description of processing	Legal basis
Business development	Acquisition of new customers	Consent
	Prospecting from existing customers Direct marketing & targeted advertising of similar products	Legitimate interest
Management of Customer relations	Management of customer enquiries Management of pre-sales and customer sales offers Management of contracts and Customer relations Management of customer orders Management of inter-operator portability Management of customer invoicing and payment Management of complaints and customer support (telephone assistance, Hotline, Helpdesk, etc.)	Performance of a contract or pre-contractual measures
	Management of customer identity verification operations when applicable (KYC – <i>Know Your Customer</i>)	Legal obligation
	Management of credit control & fraud risk	Legitimate interest
	Production of reports on activity, quality monitoring, service performance and statistics	Legitimate interest
Management of customer services	Management and monitoring of customer satisfaction Service usage behavioural analyses	Legitimate interest

OTHER PROCESSING NECESSARY FOR PROVISION OF THE SERVICES

Purposes	Description of processing	Legal basis
Management of IT and communications infrastructure	Supervision of infrastructure Traffic control Service and network usage statistics Management of infrastructure service quality	Legitimate interest
Management of the physical safety of goods and people	CCTV and physical access monitoring measures used to monitor: <ul style="list-style-type: none"> • Points of access to shops, premises and buildings • Sensitive equipment (IT servers, etc.) 	Legitimate interest
Management of IT infrastructure security	Detection, prevention and fight against threats to IT and communications infrastructure. Protection of personal data Cybersecurity	Legitimate interest
Disputes & debt collection	Management of disputes and customer debt collection	Legitimate interest
Production of statistics, surveys or studies with commercial added value	Anonymisation of data in order to carry out Big Data studies and provide Data Intelligence services	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:

- Subcontracting companies that POST uses to perform certain services, such as hosting and operating websites, sending our newsletter, managing, processing and paying for your online purchases and sending you invoices.
- Organisations providing telephone directory and information services.
- Partner insurance companies, to cover your claims when you take out cover with POST.
- Resellers and commercial partners.
- POST Finance and POST Courier, regarding operational Customer identification processes.
- POST Group companies:
 - As part of their sales prospecting, provided that you have given your consent to receive offers from them.
 - For the production of statistics, surveys or studies with commercial added value.
- Public authorities and competent jurisdictions, only when this communication is strictly required by law. Data submitted to these authorities and jurisdictions may fall under any of the categories of data listed above (see section on "Categories and Origin of Data Collected").

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, depending on the type of data processed and the purposes for doing so, POST will store your data for:

- A maximum of 30 days from the date on which the data is recorded by POST, in the case of CCTV images of shops, premises and buildings.
- A maximum of 6 months from the date on which the data is recorded by POST, in the case of data processed for the purposes of detailed invoicing, traceability, logical security or the 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, in the case of data processed for commercial prospecting purposes.
- A maximum of 3 years from the end of your commercial relationship with POST, in the case of data processed for the purposes of marketing and/or the promotion of offers provided by POST and its partners.
- A maximum of 10 years from the end of your commercial relationship with POST, in the case of 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 that they need in order to perform their duties and are regularly trained and made aware of the 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 might pose a risk to your rights & freedoms, POST is committed to complying with the obligation to notify such personal data breaches to the CNPD (Commission Nationale de Protection des Données – 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).

POST will ensure that any transfers of your personal data to authorised third parties do not involve a transfer to a country outside the European Union without taking appropriate additional protective measures, in particular to ensure that you can continue to exercise your rights.

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);
- If the conditions are met, to request a copy of the personal data that you have provided to POST in a structured format (portability) and to transmit this data to another data controller, unless this right infringes 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