

## PRIVACY POLICY

### Introduction

Proximus NXT is a commercial brand of Proximus Luxembourg S.A. which provides ICT solutions and Fixed & Mobile Telecommunication services to large and medium companies.

At Proximus NXT, one of our top priorities is making sure that the information we have about you is protected and secure. We value our relationship with you and work hard to preserve your privacy and ensure that your data is safe. At the same time, the very nature of our relationship may result in us processing certain types of information about you or your end users (customers or employees). In this privacy policy, we explain to you how we collect and process your personal data.

The Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter “GDPR”), as may be amended, replaced or repealed; the Luxembourg Act of 30 May 2005 on privacy in the electronic communications sector, as amended or replaced from time to time and all other laws and regulations, guidelines and industry standards (to the extent applicable) relating to the processing of personal data and privacy applicable to Proximus Luxembourg S.A. and you governs Proximus NXT' processing of personal identifying information for the protection of persons in the context of treating personal data.

### Collection of personal data

We collect and process personal data from customers or suppliers' end users (which may be employees, customers, etc.) provide us:

- for surveys, registration forms, etc.;
- during events and seminars where there is an exchange of business cards;
- when a purchase is made (product, services or training);
- for human resources purposes during job application processes;

Proximus NXT only collects the data that is strictly necessary to provide the services

you wish to use. We process this data for the following purposes:

- ensure requested services and products delivery in the framework of a contract;
- inform you about Proximus NXT' new technologies, new services, events, etc.;
- optimally organize an event that you have signed up to;
- Send you advertising or commercial prospecting messages provided that you have given your prior consent or, where appropriate, it is in our legitimate interests;

## Proximus NXT as Data Controller

Proximus NXT may act as Data Controller in the sense of the GDPR with regard to the processing of its suppliers, partners or customers contact details that would be collected by Proximus NXT in the framework of the business relations.

This data is used by Proximus NXT for delivering the requested services; for billing; for dispute management; for detecting fraud and infringements against Proximus NXT, its employees, customers or suppliers; for improving product and service quality; for internal reporting purposes; for the planning and organization of infrastructure and recording in our ticketing tool; for market research and to invite the customer or its end users to test products and services more relevant to the customer or its users.

Some personal data may also be processed as Proximus NXT has a legal obligation to do so, e.g. at the request of the competent authorities.

Proximus NXT delegates to professional customers the obligation to provide the following important information to its end users:

- information about the processing of personal data of end users by Proximus NXT, which acts as a data controller for the purposes mentioned in the paragraph above;
- the way in which users can exercise their rights with regard to their personal data, as described further in this chapter;
- the retention period of the personal data collected by Proximus NXT: personal data is stored for a maximum of 10 years after the contract with the customer ends.

## Proximus NXT as Data Processor

Proximus NXT acts as a Data Processor in the sense of the GDPR whenever it processes personal data at the customer's request. This is the case for personal data:

- which the customer stores in Proximus NXT' data centers or cloud (e.g. hosting, outsourcing, maintenance and support, housing, and other Cloud services);
- which the customer enters in a tool made available by Proximus NXT;
- which the customer entrusts to Proximus NXT for the purpose of configuring the service.

## Other Data Processors or "Sub-processors"

When Proximus NXT acts as a Data Processor for personal data of its customers or customers' end users, it can be assisted by sub-processors. Proximus NXT remains liable to the customer for the protection of the personal data of the customer's end

users.

Proximus NXT makes sure that your personal data is processed in a manner that is fully compatible with the purposes stated above. In the event of further processing of your data for a purpose other than that the ones originally intended, you will be provided all the necessary information beforehand in order to collect your consent. You will then have the possibility to object to this new processing.

### **Rights of the customers' end users regarding their personal data**

The end users of professional customers have the right to access, rectify and delete their personal data and must go first to Proximus NXT' professional customer to exercise these rights.

Proximus NXT' professional customer will then contact Proximus NXT for such request.

### **Collection of data for statistics and reporting**

When you link up to the Proximus NXT website to view information or to download files, we automatically collect the following data: type of domain name used to gain access to the Internet (f.e.com, .org), IP address attributed during the connection, date and time of access to the website, duration of website/page visit, browser used, the operating system or platform installed on your personal computer or the access device used, search engine and meta tags used to track the Proximus NXT website on the web, type and nature of files or information that has been downloaded. These log files are intended to map the number of visitors on various sections of our website and to continuously improve the content of the website.

### **Recipients of your personal data collected**

To the extent permitted by applicable laws and in the context of the delivery of Proximus NXT' products and services, we share your personal data with:

- our partners and/or subcontractors
- our parent company (Proximus S.A.), or other Proximus Group subsidiaries in Europe;

Thereby, your collected personal data will be stored and processed in Luxembourg and may be transferred to Proximus NXT international suppliers in accordance with data protection law (for example for the performance of requested services on behalf of Proximus NXT).

Personal data may also be disclosed by Proximus NXT if required by a legal provision or judicial or administrative decision.

Where applicable, if you are an employee of a Tango business customer, you are informed that our customer may access information concerning your consumption (including all electronic communications made by mobile and fixed telephony) for the

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purpose of proving to our customer the existence of telephone transactions triggering billing. Tango therefore offers your employer the possibility of consulting this information, enabling him to check the accuracy of the data.

## Retention periods

Your personal data that is collected and processed by Proximus NXT shall only be stored for a period of time strictly necessary for the purposes of the processing activities or to comply with any legal obligations and for:

- a maximum of three years from the end of the commercial relationship for data used for commercial prospection, marketing campaigns and/or promotions of offers from Proximus NXT and its partners.
- a maximum of 10 years from the end of the commercial relationship for data relating to accounting matters (purchase orders, invoices, etc.) contractual matters (complaints, contracts, collections, litigations etc.).

## How we protect information

We strive to protect your data and safeguard it from unauthorized individuals. We commit ourselves to ISO certifications that reflects our responsibility on processing data in a safe and secure way.

We have taken technical and organizational measures to protect databases on which your data is kept, against unauthorized access, unauthorized use, theft or loss. Our security measures are regularly evaluated and adapted so that we can continue to provide a high level of protection.

## Your rights as Data Subject

You have the right to access, rectify, erase, restrict and object to the processing of your data. You have the right to data portability for the data you provided to Proximus NXT.

However, it is important to note that a refusal to provide personal data or the exercise of such rights may result in the impossibility to carry out the required services for Proximus NXT.

To exercise these rights or if you have any questions about the processing of your data by Proximus Luxembourg S.A., you can contact us by email or by mail at the below contact details.



**E-mail:** [dpo@proximus.lu](mailto:dpo@proximus.lu)

**Postal address:** Proximus Luxembourg S.A., 18, Rue du Puits Romain – Z.A. Bourmicht L-8070 Bertrange, Grand Duchy of Luxembourg

You also have the possibility to lodge a complaint to the National Commission for Data Protection: [www.cnpd.lu](http://www.cnpd.lu).

Changes in our data privacy policy

Our privacy policy may be adapted or modified in the future. For this reason, we recommend that you consult this privacy policy regularly.