

## PRIVACY POLICY

### Introduction

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

At Telindus, 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processing of personal data and on the free movement of such data (hereinafter “GDPR”), as may be amended, replaced or repealed; the Luxembourg Act of 30 May 2005 on privacy in the electronic communications sector, as amended or replaced and all other laws and regulations and guidelines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 Telindus' processing activities of 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, on registration forms, etc.;
- during events and seminars where there is an exchange of business cards;
- when a purchase is made (products, services or trainings);
- for human resources purposes during job applications process.

Telindus 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 Telindus' 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;

## **Telindus as Data Controller**

Telindus 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 Telindus in the framework of the business relations.

This data is used by Telindus for delivering the requested services; for billing; for dispute management; for detecting fraud and infringements against Telindus, 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 Telindus has a legal obligation to do so, e.g. at the request of the competent authorities.

Telindus 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 Telindus, 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 Telindus: personal data is stored for a maximum of 10 years after the contract with the customer ends.

## **Telindus as Data Processor**

Telindus 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 Telindus' 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 Telindus;
- which the customer entrusts to Telindus for the purpose of configuring the service.

## **Other Data Processors or Sub-processors**

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

Telindus 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 customers' end user 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 Telindus' professional customer to exercise these rights.

Telindus' professional customer will then contact Telindus for such request.

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

When you link up to the Telindus 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 Telindus 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 Telindus' 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 Telindus international suppliers in accordance with data protection law (for example for the performance of requested services on behalf of Telindus).

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

### **Retention periods**

Your personal data that is collected and processed by Telindus 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 Telindus 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 Telindus.

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 Telindus.

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.

*Last update June 30, 2021*