



## INFORMATION NOTICE ON PERSONAL DATA PROTECTION

### ARTICLE 1: WHO IS THE DATA CONTROLLER?

According to the applicable regulations, cegecom s.a. is defined as the controller of the personal data collected from you.

In this capacity, we are responsible for the way your data are processed, transferred and stored.

### ARTICLE 2: WHICH CATEGORIES OF DATA ARE PROCESSED?

In order to carry out its task as telephone, Internet access and ICT provider, cegecom s.a. is required to collect certain elements of your personal data, whether you are an existing or prospective customer.

Depending on the purposes, cegecom s.a. may process the following categories of data:

- **personal identification data**, such as your name, your first name, your address, your phone number, your birthdate, your gender, your nationality, your identity card number, your signature, etc.;
- **electronic identification data** collected in order to access to cegecom s.a. applications (mainly your IP address and/or your email address);
- **financial data**, such as your bank account details slip, your income, etc.;
- **data relating to your civil or professional status**, such as your marital status, your household composition, your profession, etc.;
- **data relating to contracts taken out with cegecom s.a.**, such as your contract number, changes made, etc.

In any case, cegecom s.a. ensures that only data which are adequate, relevant and limited to what is necessary in relation to the declared purposes are collected, processed and stored.

You are not legally required to send us the personal data that we are requesting. In case of failure to send us your data, we may be unable to provide the requested products and services, to offer you the services that could interest you, to adapt our offerings to your individual needs or to manage your telephone or internet access contract.

### ARTICLE 3: WHAT IS THE PURPOSE AND THE BASIS OF THE PROCESSING OF YOUR PERSONAL DATA?

Personal data are collected for the following purposes:

- managing the business relationship with you, with your legal representative, with our telephone or internet access subcontractors, with business partners, via internet and social networks, including the promotion of our products.

For each purpose listed above, data collection and processing are realised in accordance with the legislation in force and the current regulations on the protection of personal data, including the European Regulation (EU) 2016/679 of 27 April 2016.

Therefore, data collection and processing shall be lawful only if and to the extent that at least one of the following applies:

- processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which we are subject;
- you have given your consent to the processing of your personal data for one or more specific purpose;
- processing is necessary for the purposes of the legitimate interests pursued by us.

### ARTICLE 4: WHO HAS ACCESS TO YOUR PERSONAL DATA?

We ensure that your personal data are processed in a manner that is consistent with the purposes specified above.

These data may be shared with some of our in-house units, within the strict framework of the missions entrusted to them.

It includes members of the contract management unit, the legal and compliance unit (compliance monitoring), the internal audit and the IT department.

Within the limited scope of the aforementioned purposes and to the extent that this is necessary, we also share your personal data with your intermediary, legal advisers and the relevant Luxembourg or foreign administrations.

### ARTICLE 5: WHERE ARE YOUR PERSONAL DATA PROCESSED?

Your data are processed by cegecom s.a. For data security and backup reasons, your data are transferred to a certified Provider of Digitalisation and Conservation Services (PSDC) located in Luxembourg.

For these transfers, cegecom s.a. has put in place very binding agreements compliant with the European Regulation, which embodies our commitment to protect the processing of your personal data.

### ARTICLE 6: WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?

Under the conditions provided for in regulations, you have the right:

- to access to the personal data we hold about you;
- to rectify them if they are inaccurate or incomplete;
- to have them erased under certain circumstances such as, for example, when they are no longer necessary in relation to the purpose for which they are originally collected or processed provided that we have not already deleted them in accordance to our data retention policy;

- to request the restriction of their processing under certain circumstances such as, for example, the suspension of the use of any personal information of which you contest the accuracy for the period enabling us to verify your request;
- to object to their processing if it is only based on the pursuit of our legitimate interests;
- to request the portability of your personal data, that is, to receive your personal data, that you have provided to us, in a structured, commonly used and machine-readable format or to have them directly transferred to another controller;
- to withdraw your consent at any time to the processing of your data, without this affecting the lawfulness of processing based on the consent given prior to withdrawal and unless the processing has a legal basis other than your consent;
- to lodge a complaint with the supervisory authority of your country and/or the Grand Duchy of Luxembourg (National Commission for Data Protection – CNPD).

To exercise these rights, you simply have to follow the procedure mentioned under article 9 below.

#### **ARTICLE 7: HOW AND WHEN CAN YOU OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA?**

If allowed by the regulations in force, and especially if the processing is only justified by the pursuit of our legitimate interests, you have the right to object to the processing of your personal data or to prohibit us from processing them (including for direct marketing purposes).

Once you have informed us of this request, we will not process your personal data anymore, unless we are authorised by the regulations.

You can exercise this right in the same way as for your other rights by following the contact procedure mentioned under article 9 below.

#### **ARTICLE 8: HOW LONG DO WE STORE YOUR PERSONAL DATA?**

We store your personal data as long as it is necessary for the purposes mentioned above or as long as it is legally required.

The retention time of contractual data expires at the end of the statutory limitation period.

#### **ARTICLE 9: HOW CAN YOU CONTACT US AND EXERCISE YOUR RIGHTS?**

You can send your questions relating to the processing of your personal data and exercise your rights mentioned above by contacting the Data Protection Officer (DPO):

- by email at the following address: [dataprotection@cegecom.net](mailto:dataprotection@cegecom.net);
- or by post at the following address:  
cegecom s.a., Data Protection Department,  
cegecom s.a., 3, rue Jean-Piret - L-2350 Luxembourg  
B.P. 2708 - L-1027 Luxembourg, Grand-Duchy of Luxembourg.

A two-sided copy of your valid ID must also be sent to us.

We will answer you personally.

Any complaint relating to the processing of your personal data may be sent to the email or postal address mentioned above or to the supervisory authority:

- National Commission for Data Protection (CNPD) located at avenue du Rock'n'Roll 1, L-4361 Esch-sur-Alzette, Grand Duchy of Luxembourg ([www.cnpd.lu](http://www.cnpd.lu)). For more information, please visit the "Download" page of our website at <https://cegecom.lu/en/general-informations/gdpr>

#### **ARTICLE 10: HOW AND WHEN THIS INFORMATION NOTICE WILL BE UPDATED?**

In order to comply with the current regulations, cegecom s.a. undertakes to update the present information notice whenever necessary. The latest version is systematically put on line on our website.

After having read the information notice on data protection mentioned above and which is also available on the cegecom website at <https://cegecom.lu/en/general-informations/gdpr>, I acknowledge that I understand the terms of this.