

## 1. General

At cegecom s.a. ("cegecom"), we take the protection of your personal data very seriously. Your privacy is important to us. We process your personal data in connection with the provision of telecommunications services in accordance with applicable legal data protection requirements for the purposes listed below. Personal data within the meaning of this data protection policy is all information that relates to your person. Relevant personal data includes, but is not limited to, your personal data (e.g., name, address, email address, date of birth, telephone numbers, IP address, subscriber line information), billing data (e.g., detailed call history, bank account details, payment data, login data), information about your financial situation (e.g., credit data, payment history) as well as advertising and sales data (e.g., results of customer data analysis). The provision of telecommunications services requires the processing (such as collection, storage, use or use) of personal data. According to this, this data may only be processed if this or other legal provisions allow this or if you yourself have consented to the processing of the data for a specific purpose that is not already permitted by law. You can revoke your consent at any time with effect for the future. Below you will find out how we process this data. For a better overview, we have divided our data protection information into chapters.

## 2. Data controller, data protection officer and contact

The controller of your personal data is:  
cegecom s.a.

3, Rue Jean Piret B.P. 2708 L-1027 Luxembourg

Tel.: +352 27 60-1, E-Mail: [info@cegecom.net](mailto:info@cegecom.net)

You can contact our Data Protection Officer at the following address:

cegecom s.a., Data Protection Officer  
Heinrich-Barth-Straße 17, 66115 Saarbrücken  
Email: [datenschutz@cegecom.net](mailto:datenschutz@cegecom.net)

## 3. Purposes and legal bases of the processing

### 3.1 Performance of the contract and invoicing as well as legal obligations

Cegecom processes the inventory data necessary for the establishment, sealing, modification and termination of the contractual relationship for the provision of the agreed telecommunications services. This includes in detail the customer and billing data you provided when placing your order, as well as your user IDs and email addresses received from cegecom. However, this also includes data related to the detection of defects and misuse of telecommunications services. Cegecom also processes your traffic data insofar as this is necessary for the implementation and billing of the agreed telecommunications services or for the fulfilment of legal information obligations. These include, for example, the telephone number or the identifier of the calling line and the called party or terminal equipment, personal authorisation identifiers, the start and end of the respective connection with the date and time, the data volumes transmitted to the extent that prices depend on them, the telecommunications service you use, endpoints of fixed connections with start and end and date and time, other data used to establish and maintain and for billing the necessary traffic data. In the context of Internet access services, the IP address and the start and end of its assignment are also stored on a date- and time-based basis. However, this also includes data related to the detection of defects and misuse of telecommunications services. Cegecom processes the billing data necessary for the correct determination and billing of the telecommunications services provided (cf. Art. 6 (1) (b) GDPR). In addition to the inventory, usage, and traffic data needed for billing, this is also other relevant data, such as incoming payments, payment arrears, reminders, connection blocks made and lifted, claims submitted, and more. At your request, cegecom will issue a detailed call recording in which all the connections in your connection for which you are liable to pay are indicated in detail. If your connection is intended for a household, we can only issue the detailed call list if you have previously declared in writing that you have informed all co-users of the connection belonging to the household of the request for a detailed call list and that you will also inform future co-users of this. Insofar as it is a company or official link, the detailed call report can only be drawn up if you have previously stated in writing that the employees have been informed of the issuance of the detailed call report and that the future employees will also be informed immediately, and that the works council or employee representatives have been involved, insofar as such participation is required in accordance with the regulations in force is mandatory. The corresponding declarations are included in your order form. Cegecom transmits the display of your telephone number by default. You can permanently remove the number display for each outgoing call, either individually or on separate request. Connections to police and fire emergency telephone lines are excluded. If you want, your phone number will be constantly deleted, even for incoming connections. If you have placed an order with us for this purpose, cegecom will provide you with your name with your telephone number, address and, if applicable, further information in Deutsche Telekom's communications directory, which serves as the basis for print directories, electronic media and the operation of directory enquiry services. However, you can decide for yourself which data should be published in the directory, whether the listing is only made in printed or electronic directories or whether no records are omitted. Additionally, you can decide whether the phone information is limited to your phone number or omitted. You are free to object at any time to the use of your customer data that you have requested, in whole or in part, with effect for the future. Cegecom is obliged to provide each company with the aforementioned end-user data upon request for the purpose of providing publicly available information services, information services on an individual request for a meeting by another user and end-user directories. Electronic end-user directories may contain, among other things, the following search functions:

- Search by phone number
- Search by name
- Search by address

These search functions do not fall within the sphere of influence of cegecom, but are determined by the respective provider of the end-user's directory. To the extent technically possible, you have the option of forwarding a call to your device initiated by a third party (deactivating call forwarding). The content of the message (i.e. speech) is stored in accordance with the relevant data protection provisions only if this is necessary for the provision of the specific service (e.g. for mailboxes from which you can retrieve incoming calls).

Cegecom uses your data for services that allow you to make contract changes (e.g., bandwidth changes, contract extensions, price changes, etc.) over the phone. As part of this service, the employees of the service hotline have access to your customer data. To protect your data from unauthorized changes, you must log in to the hotline with a customer password.

If you have only been notified to us as a different invoice recipient, we will process your data exclusively for billing purposes for the services provided.

Communication for questions relating to the performance of the contract is usually carried out by post or on your online customer portal, if you have registered on this portal and have agreed to communication via the portal. If you have provided us with an e-mail address or a telephone/mobile number, we will use this to quickly deal with the contract and billing matters mentioned above as well as in the context of receivables management. The increase in user activity in direct communication channels suggests that this type of customer approach is expected.

### 3.2 Advertising

Cegecom uses your contact information to provide you with information about its own products or similar services in the field of telecommunications (e.g., service extensions, hardware options) for direct marketing purposes. Cegecom has a legitimate interest in processing your contact details for direct marketing purposes for Cegecom products tailored to you, namely the promotion of the sale of its own products. Your legitimate interest in your aforementioned data not being used for this purpose does not outweigh this legitimate interest of cegecom, as cegecom uses this data appropriately in accordance with the described processing purpose and does not use any sensitive data from your customer relationship with cegecom for this purpose. The use of your data for advertising purposes also constitutes processing that you can expect in the context of existing contractual relationships or after you have expressed an interest in cegecom's products or services, so that harassment by direct advertising cannot be presumed. In addition, cegecom will only use your aforementioned data for direct advertising of cegecom products if you have not objected to this.

In order to send you advertising, we may pass on your contact details to third parties and processors (e.g. shipping service providers, media agencies). This processing of your aforementioned data is necessary to safeguard the legitimate interests of cegecom or a third party and is justified by a balancing of interests in our favour. Without the use of this data, no direct marketing will be presented to you.

Cegecom also ensures that the intensity of disruption for you is as low as possible through the selected advertising communication channels.

Cegecom will only use your data for advertising purposes other than by post if you have given your separate consent to this effect or if we can invoke a legal basis of justification.

### 3.3 Market and opinion research

Cegecom also forwards your name and address to market and opinion research institutes so that they can carry out surveys. The market research and opinion institutes act on behalf of and in accordance with the instructions of cegecom. Through these surveys, we gain a holistic view of the transparency and quality of our products, services, and communications and can align or design them in your interest. This treatment is justified by a balancing of interests in favour of cegecom. Cegecom has a legitimate interest in processing your data for market research and opinion purposes, namely the improvement of the products and services offered and therefore the promotion of the sale of its own products, possibly also in relation to the products of third parties. This allows cegecom to know your acceptance and satisfaction with the products and services offered by cegecom and to evaluate and analyze your interests in order to be able to offer you even better products and services tailored to your needs in the future. The use of your data for market research and opinion purposes also constitutes processing that you can expect in the context of existing contractual relationships or after you have expressed an interest in cegecom's products or services. Your data will only be used for the aforementioned purposes, which, unless you object, are also in your interest.

If the market research and opinion research are carried out by persons other than the post office, they will only be carried out if you have given us your separate consent to the use of the data.

### 3.4 Credit Check

Within the scope of the provisions of Article 6(1)(b) and (f) of the GDPR, cegecom will carry out a credit check with you before entering into a contract and will include the results of this credit check in the decision to enter into a contract with you in accordance with the legal requirements. If there is negative information about the characteristics of your creditworthiness, we may refuse a contractual relationship with you. In order to obtain a credit report for you, cegecom will forward your name, address and date of birth to Creditreform s.a.

This processing of your above-mentioned data is necessary to safeguard the legitimate interests of cegecom and is justified by a balancing of interests in favour of cegecom. Without a transfer to one of these companies, cegecom cannot check your

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creditworthiness. We also have a legitimate interest in processing your above-mentioned data for the purpose of credit checks, i.e. the associated assessment of your creditworthiness before the conclusion of the contract and the reduction of the risk of payment default for cegecom.

Your legitimate interest in your aforementioned data not being used for this purpose does not outweigh this legitimate interest of cegecom, as cegecom uses this data appropriately in accordance with the described purpose of processing and you can expect such use of your data for credit checks when establishing contractual relationships. In addition, you are also protected by this processing, as it can protect you against entering into contracts that are beyond your capacity.

## 3.5 Other Purposes

If other purposes for the use of the data arise in addition to the already existing purposes, we will check whether these additional purposes are compatible with and compatible with the original purposes of the collection. If this is not the case, cegecom will inform you of such a change in purpose. Unless there is another legal basis for further use of the data, we will not use your personal data without your consent.

## 4. Recipients of your personal data

### 4.1. Third parties and subcontractors

Your personal data will also be used by other companies that act on behalf of cegecom ("subcontractors") or as part of cegecom's commercial partnerships ("third parties"). These may be companies within the E.ON group or external companies and partners. Possible recipients of your data are auditors, credit agencies, debt collection agencies, telecommunications service providers, shipping service providers, call centres, marketing and media agencies, market research institutes, IT service providers, consultants or consulting companies and other service and cooperation partners. However, public and external bodies may also receive data on the basis of legal provisions (e.g. law enforcement authorities). For more details, please refer to the descriptions of data processing in Chapter 3.

### 4.2 Transfer of data to a third country

cegecom has services and services performed by carefully selected and mandated service providers or their service sub-providers, who may be based outside the European Economic Area ("third countries") and who carry out their data processing from countries in which there is no adequate level of data protection (so-called "unsafe third countries"), e.g. IT service providers. In these cases, there is a transfer to a third country. To the extent required by law to establish an appropriate level of protection for your data, cegecom uses safeguards in accordance with legal requirements to establish an appropriate level of data protection, including EU model contracts. A copy of the standard contractual clauses specified by the European Commission is available on the Internet at the following address: <https://eur-lex.europa.eu/>. Alternatively, you can also obtain them from us on request (see section 2 for contact details).

## 5. Data storage and deletion

With the exception of the exceptions mentioned below, we delete your inventory data when the contractual relationship with you has ended, all mutual claims have been satisfied and there are no other legal retention obligations or legal justifications for storage. Your data will be blocked until it is deleted. The lock-up phase until the write-up begins at the end of the year following the end of the contract. If the data is not affected by this, it will be deleted. We will use your name and postal address for a maximum period of 24 months after the end of the contractual relationship. The legal basis for processing is a balancing of interests in our favour. Our legitimate interest is to reconvince you of our products and services as part of advertising reacquisition efforts. If you object, you have the option of stopping this treatment at any time. Cegecom uses this data appropriately in accordance with the described processing purpose and does not use sensitive data from your previous customer relationship for this purpose. If you have given us your consent to an advertising approach by e-mail or telephone during the duration of the contractual relationship, we will use your data for advertising purposes for a maximum period of 12 months after the consent has been granted, regardless of the duration of the contractual relationship. Subsequent use beyond this period will take place if they do not contradict the advertising address. We delete the traffic data immediately if it is no longer relevant for billing and no later than 6 months after the invoice has been sent. Data on Internet sessions will be deleted after 7 days at the latest, usually immediately after the session ends. We delete detailed call recordings after 6 months at the latest. We delete the data for the credit check 6 weeks after the application.

## 6. Your Privacy Rights

To exercise your data protection rights described below, you can contact our Data Protection Officer at any time (see section 2 for contact details).

### 6.1 Information, rectification, deletion, etc.

We will be happy to inform you about whether and which of your personal data is stored by us and to whom we may have passed it on. In accordance with the statutory provisions, you can assert the following additional rights: rectification, deletion, restriction of processing (blocking for certain purposes).

### 6.2 Right of withdrawal

If you have given us separate consent for the processing of your personal data, you can revoke this consent to us at any time for the future. The lawfulness of the processing of your data until the revocation remains unaffected by a revocation.

### 6.3 Right to data portability

You have the right to receive personal data about you in a structured, commonly used and machine-readable format. You have the right to transmit this data to another controller. If technically feasible, you have the right to obtain a transfer from us directly to another controller.

### 6.4 Right to object

You have the right to object at any time to the processing of your data that is carried out on the basis of a balancing of interests or in the public interest, if there are grounds for doing so that arise from your particular situation. This also applies to profiling based on this provision. If you object, we will no longer process your personal data, unless we can demonstrate compelling legitimate grounds for the processing outweigh your interests, rights and freedoms, or that the processing serves to assert, exercise or defend legal claims. We also process your personal data for direct marketing and market and opinion research purposes. If you do not wish to receive advertising, you have the right to object to it at any time; This also applies to profiling, insofar as it is related to such direct advertising. We will take this contradiction into account for the future. The objection may be made in any form and should be addressed to the contact details mentioned in point 2 if possible.

### 6.5 Questions or complaints

If you have any questions or complaints, please contact our Data Protection Officer at any time (see section 2 for contact details). Without prejudice to any other recourse, you have the right to lodge a complaint with a supervisory authority. The competent supervisory authority for us is the National Commission for Data Protection (CNPD), 1, Avenue du Rock'n'Roll, 4361 Esch-sur-Alzette, Grand Duchy of Luxembourg ([www.cnpd.lu](http://www.cnpd.lu)).