



Personal data protection information and explanatory notice

Orange aspires to be recognised as a business that is trusted by its customers, employees and partners. We see in the news how new technologies can be intrusive and that data protection is a major challenge for a business such as Orange, whose mobile and fixed networks generate an ever-increasing volume of personal data.

This document provides you with more information about how Orange implements its commitments in its provision of mobile and fixed telephony and internet services.

❖ Article 1: Who is the “Data Controller”?



Under the applicable regulations, ORANGE LUXEMBOURG is the Data Controller for the data we collect about you.

As Data Controller, we are responsible for how these data will be processed, transmitted and stored.

❖ Article 2: What categories of data are processed?

In order to provide telephony and internet access services, ORANGE LUXEMBOURG has to collect personal data about you, whether you are already a customer or are looking to become one.

Depending on the purpose of the processing, ORANGE LUXEMBOURG may process the following categories of data:

- personal details, including your surname, forename, address, telephone number, date



of birth, sex, nationality, identity document number, signature, etc....);

- traffic information for each call or internet session. This traffic information contains the numbers called, the identification of the telephone, the data and duration of the communication or the date, duration and data volume of the internet session;
- electronic identification data obtained in connection with access granted to ORANGE LUXEMBOURG apps (mainly your IP address, and/or your email address);
- financial data, including your bank account details, your income, etc.;
- data relating to your civil or occupational status, including your marital status, the composition of your family, your job, etc.;
- data relating to the contracts taken out with ORANGE LUXEMBOURG, including your contract number, any changes, etc.

In all cases, ORANGE LUXEMBOURG will ensure that only data appropriate and relevant to what is necessary for the stated purposes are collected, processed and stored.

You are not legally required to send us the personal data we ask for. However, if you do not provide this information, we may be unable to provide the products and services you require, to offer you services that might be of interest to you, to tailor the products and services we offer to your needs, or to manage your phone or internet access contract.

❖ **Article 3: what is the purpose of and the basis for processing your personal data?**

The purpose of the personal data provided is:

- management of our commercial relationship with you, with your legal representative, with our phone and internet access subcontractors, and with commercial partners, via the internet and social networks, including the promotion of our products.
- Management of the commercial relationship with our suppliers

- Dispute management
- Analysis of your usage and connections in order to improve the quality of our services and our network
- Retention of the legal or security information required for us to fulfil our obligations

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

The data collection and processing are therefore based:

- either on the fact that the processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract;
- or on the fact that the processing is necessary to comply with a legal obligation to which we are subject;
- or on your consent;
- or on an interest of ours that is recognised as legitimate

❖ **Article 4: Who has access to your personal data?**

We ensure that your personal data are processed in a way that is compatible with the purposes set out above.

These data may be shared with some of our departments but only to the extent that this is necessary for the tasks entrusted to them.

This includes members of the following departments: contract management, legal and compliance, internal audit, and IT.

Within the limited framework of the purposes set out above and only to the extent that this is necessary, we also share your personal details with your intermediary, legal advisers and with the relevant Luxembourg or foreign authorities.

❖ Article 5: where will your personal data be processed?

Your personal data are processed at ORANGE LUXEMBOURG. To ensure the security and protection of your data, they are also transferred to an approved Digitalisation and Storage Services Provider situated in Luxembourg, which is also responsible for backing them up.

ORANGE LUXEMBOURG has put very restrictive agreements in place for these transfers; those agreements comply with the European regulations and demonstrate our commitment to providing appropriate protection for the processing of your personal data.

❖ Article 6: What are your rights concerning your personal data?

Where the applicable regulations allow it, you have the right:

- to access the data we hold about you,
- to have them rectified if they are inaccurate or incomplete,
- to have them erased in certain circumstances, for example if they are no longer required for the purpose for which they were collected and processed and we have not already erased them under our data retention policy,
- to have the processing restricted in certain circumstances, for example, where you dispute the accuracy of certain data, to restrict the use of those data while we are verifying their accuracy,
- to submit a complaint to the relevant data protection authority in your country and/or in the Grand Duchy of Luxembourg (*Commission Nationale pour la Protection des Données – CNPD*),
- to object to the processing where it is based solely on the pursuit of our legitimate interests,
- to portability of your personal data, in other words the right to receive the personal data you have provided to us in a structured, commonly used and readable format or to have them transferred directly to another data controller,
- to withdraw your consent to the processing of your data at any time, without this affecting the lawfulness of processing based on the consent carried out



before its withdrawal and unless there is another legal basis for the processing in addition to that consent.

In order to exercise these rights, you simply need to follow the procedure described in point 9 below.

❖ **Article 7: How and when can you object to processing?**

If current regulations allow it, and in particular 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 prevent us from processing them (including for direct marketing).

Once you have informed us of this request, we will no longer process your personal data, unless we are authorised to do so by the regulations.

You can exercise this right in the same way as your other rights by following the contact procedure set out in point 9 below.

❖ **Article 8: For how long do we retain your personal data?**

We retain your personal data for as long as is necessary to achieve the purposes set out above, or for as long as the law requires.

The retention period for contractual data ends at the end of the statutory limitation period.

❖ **Article 9: How can you contact us and exercise your rights?**

You can send us any questions regarding the processing of your personal data and exercise your rights set out above by contacting the Data Protection Officer (DPO):

- by email to data.protection@orangeluxembourg.lu,
- by post to: ORANGE LUXEMBOURG, DPO, 8 rue des Mérovingiens à 8070 Bertrange, Grand-Duché de Luxembourg.

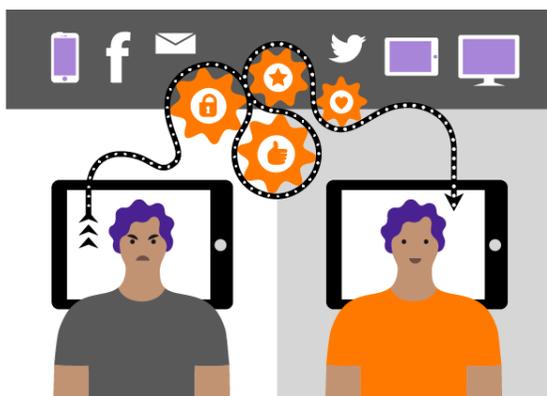
You must also send us a copy of the front and reverse of your current identity document.

We will then send a reply to you in person.

Any complaint concerning the processing of your personal data can be sent to the postal and email addresses given above or to the data protection authority, i.e.:

- Commission Nationale pour la Protection des Données (CNPd), 1, Avenue du Rock'n'Roll, à 4361 Esch-sur-Alzette, Grand-Duché de Luxembourg (www.cnpd.lu). For more information, please consult our "Data Protection Policy" page on our website at <http://www.orange.lu/fr/legal/politique-confidentialite>

❖ Article 10: when and how will this notice be updated?



In order to comply with current regulations, ORANGE LUXEMBOURG undertakes to update this notice whenever necessary. The most recent version will always be posted online on our website.

I confirm that I have read and understood the personal data protection information notice above, which is also available online at the ORANGE Luxembourg website

<http://www.orange.lu/fr/legal/politique-confidentialite>.