

1. Introduction

Proximus S.A. of public law (“**Proximus**”) is committed to protecting your privacy and only uses the information it collects about you as described in this Privacy Notice. In doing so, Proximus acts in accordance with applicable privacy legislation, including the General Data Protection Regulation or “**GDPR**”.

As part of this commitment, Proximus wishes to explain, through this Privacy Notice, how and why it processes your personal data when using the Cloud application (“**App**”), how long your data are stored and with whom your data will be shared. This Privacy Notice also informs you on who you can contact within Proximus in case of questions or in case you wish to exercise your rights.

2. Who is the controller?

Proximus, with its registered office at 27 Bd. Du Roi Albert II, B-1030 Brussels and registered at the ECB under number 0202.239.951, is responsible for the collection and processing of your account information for purposes of account creation and billing, in the capacity of a controller.

The App enables you to upload and store your personal files (e.g. documents, photos, music) (“**Content**”), to synchronise your device(s) with the App and to share your Content with your contacts. Regarding the personal data collected and processed in the App for these purposes, you are acting as the controller.

3. What is in scope of this Privacy Notice?

This Privacy Notice is applicable to the processing of your account information in the App. The personal data processed in the context of the purposes for which you are a controller, are out of scope of this Privacy Notice.

4. For what purposes does Proximus collect and process your personal data?

Your personal data is processed to i) create your account in the App and ii) for billing purposes. This will allow you to use the other functionalities of the App, namely, to store your Content, synchronise your device(s) with the App and share your Content with your contacts.

5. What personal data will Proximus process and on what lawful basis?

Account information – Proximus collects and processes your account information.

When creating an account in the App, you are requested to verify and complete the following personal data:

- title (Mr., Mrs.);
- first name and last name;
- date of birth;
- email address;
- mobile phone number; and - postal address.

The App also processes your MyProximus login credentials, since these credentials are used to log in to the App. Furthermore, the App will collect technical information relating to your connected device(s) that are used for uploading and downloading Content (e.g. brand and model of the device).

The App also assigns a randomly generated technical identifier to you, which keeps a technical trace of your interactions and allows us to provide you with the requested service of the App.

The use of the App with 10 GB cloud space is free when you are a Proximus customer with an internet subscription. However, if you decide to enlarge your cloud space to 100 GB or 1 TB, or if you want to use the App as a Proximus customer without internet subscription, Proximus will process your billing data, which it already processed for invoicing purposes for your other subscription(s), in order to invoice the (extended) use of the App.

The processing of your account information is necessary for performing our contractual obligations (art. 6(1)(b) GDPR) once you created an account in the App.

Your personal files – The App offers you the possibility to upload and store your Content. You are the controller regarding the personal data included in the Content.

Your contacts – The App offers the possibility to synchronise your contacts, which allows you to share your Content with your contacts. You are the controller with regard to the personal data of your contacts.

Usage information – The App collects information on the use of the App, containing the total amount of users and the cloud space that is used. This information is anonymised.

6. How long does Proximus keep your data?

Your data is stored in the App for as long as your account on the App is active. If you choose to delete your account, your data will be deleted.

Your data is also backed-up on a daily basis. These back-ups are deleted after a week.

7. With whom does Proximus share your data?

Proximus relies on a partner – Synchronoss - for hosting, support, maintenance and troubleshooting related to the App. This partner is based in the European Economic Area ("EEA") but may use a subcontractor outside the EEA. In this context, Proximus provides adequate safeguards so that your personal data can in any case benefit from an adequate level of protection.

8. How do we protect your personal data?

We take technical and organisational measures to protect your data in the App against unauthorised access/use, theft or loss.

You will find an overview of the technical and organizational measures below: -

Credentials to log in to App;

- Encryption of data in transfer and at rest;
- Prevention of access to the App without prior authorisation;
- Prevention of reading, copying, modifying or removing data without prior authorization;

- Logging for ensuring to immediately check and establish whether and by whom data has been accessed;
- Physical access controls, system access controls, data access controls and input controls are in place and are regularly tested and evaluated on their effectiveness;
- Tests, assessments, and evaluations of the effectiveness of the above mentioned technical and organizational measures are in place.

9. What are my privacy rights and how can I exercise them?

Right of access

You have the right to request access to your account information.

Right to rectification

You can have your personal data corrected in case you notice that your account information is not or no longer correct.

Right to erasure

You can delete your Content in the App yourself.

Right to lodge a complaint

If you are not satisfied with the answer you receive from Proximus, or you do not agree with our opinion, you can contact the Data Protection Authority and submit a complaint. More information: see www.dataprotectionauthority.be/contact-us.

10. Contact details of the Data Protection Officer (“DPO”)

If you have any questions about this Privacy Notice or about the processing of your personal data in the App, please contact our DPO:

- Via email: privacy@proximus.com; or
- Via postal mail: Proximus Data Protection Office – Boulevard du Roi Albert II, 27 – B-1030 Brussels.