



## PERSONAL DATA PROTECTION POLICY

### Introduction

The company Eutelsat S.A. which markets kconnect's products and services, attaches great importance to the protection of privacy and Personal Data for users of its websites and services.

This policy (the "**Policy**") describes Eutelsat's commitment to protecting the Personal Data of internet users (the "**Visitors**") and users of its Services (the "**Subscribers**"). It also provides information on the processes for collecting and using your Personal Data, as well as your rights in this respect.

It may be modified at any moment by Eutelsat S.A., in particular in order to comply with regulatory, legal, editorial and/or technical changes.

Before you use the Website, we recommend you refer to the latest version of the Policy, available on the Website.

Eutelsat complies with European General Data Protection Regulations No. 2016/679 of 27 April 2016, the French Informatique & Libertés data protection legislation N° 78-17 of 6 January 1978, modified, and the French law "pour la confiance dans l'économie numérique" (trust in the digital economy) N° 2004-575 of 21 June 2004 (Article L. 34-5 of the French Postal and Electronic Communications Code).

To this end, Eutelsat has appointed a data protection officer responsible for ensuring the compliance of data processing by Eutelsat or its third-party suppliers and to ensure your rights are exercised.

The Policy should be applied in parallel with the conditions of the [General Terms of Use of the Website](#) and the [Contractual Conditions](#) available on the Website, the definitions of which it includes.

### Article 1. Who is responsible for data processing?

Data processing is the responsibility of Eutelsat S.A., a public limited company with capital of 658,555,372.80 euros, and registered on the Paris trade and companies register (RCS) number 422 551 176, and whose registered offices are located at 32, Boulevard Gallieni - 92130 Issy-les-Moulineaux – France.

### Article 2. What Personal Data are collected by Eutelsat S.A.?

In the context of a subscription to Eutelsat's services, during the provision of the Services or within the context of visiting the Website, we collect Personal Data about you, provided directly by you, or automatically and indirectly from our suppliers in order to provide you with these Services.

Eutelsat principally processes the following Personal Data, the purpose of which is presented to you in Article 3:

- Data relating to your identity such as your first name(s), last name(s), date and place of birth;
- Data relating to your contact details such as your postal address, email address, and telephone numbers;
- Bank and financial details, such as your payment methods, bank account number, invoicing and payment history;
- Identification and authentication data such as your IP address, login details...;
- Information relating to the Services subscribed and used: characteristics and identification of equipment for reception of the Service, consumption reports, after-sales and helpdesk requests;
- Data from recordings of telephone calls made to the phone numbers indicated on the Website;

- Technical data: data collected using cookies, browsing history, login logs, data relating to the installation of software programmes and apps for the provision of Services;
- Data relating to your use and activity for the Services: user statistics, subscriptions, consumption, type of use;
- Data relating to possible complaints and disputes.

When Personal Data is collected, we will let you know whether it is optional or compulsory. As appropriate, the failure to enter compulsory Personal Data may result mean it is not possible to process your request.

### Article 3. Why does Eutelsat collect my Personal Data?

Due to its responsibility for data processing, Eutelsat collects and processes your Personal Data for clearly defined and legitimate purposes.

Eutelsat processes your data within the scope of your use of the Website, your requests for information or eligibility, and your requests for subscription to our Services.

The table below explains the various purposes for processing your Personal Data and the legal basis on which each one rests.

| Purpose   | Legal basis  |
|---|--|
| Managing requests for information about Services and eligibility requests                   | Completion of pre-contractual measures taken following the request by the person concerned |
| Provision of Services, delivery and installation of equipment for the reception of Services | Contract with the Subscriber   |
| Subscriber identification and login for the management of Services                          | Contract with the Subscriber   |
| Request for information on the Subscriber's credit rating                                   | Legitimate interests of Eutelsat   |
| Invoicing and reception of payments   | Contract with the Subscriber   |
| Managing after-sales service and assistance for Services                                    | Contract with the Subscriber   |
| Managing cancellation of subscriptions  | Contract with the Subscriber   |
| Managing possible payment recovery  | Legitimate interests of Eutelsat   |
| Managing complaints and disputes  | Contract with the Subscriber and Eutelsat's legal obligations                              |
| Compiling statistical, use and consumption data   | Legitimate interests of Eutelsat   |
| Managing deployment, security and maintenance operations for the platform and Services      | Legitimate interests of Eutelsat   |
| Combating fraud   | Eutelsat's legal obligation  |
| Improving packages, customer relations and support  | Legitimate interests of Eutelsat   |
| Marketing communications to Subscribers   | Contract with the Subscriber   |
| Sales, surveys, competitions  | Permission for sales contact   |
| Storing of data required for the provision of the Services                                  | Eutelsat's legal obligation and operation of the contract with Subscriber                  |

|  |                             |
|--|-----------------------------|
| Response to the request for communication of data by official authorities and bodies | Eutelsat's legal obligation |
| Response to judicial or official requests and interdiction procedures                | Eutelsat's legal obligation |

#### Article 4. Who will my Personal Data be shared with?

Your Personal Data are provided to Eutelsat teams and companies belonging to Eutelsat's group, third-party suppliers and service providers involved in providing the Services, the management and performance of the contract and the services you have requested.

The Personal Data processed may be sent to the competent authorities, administrations or organisms in the context of legal or regulatory procedures, requisitions or legal decisions and communications requests, or in the context of potential subsidy processes.

#### Article 5. How long will my Personal Data be stored?

Your Personal Data is stored only as long as is strictly necessary for the purposes described in Article 3 above, or in accordance with legal and regulatory limitations applicable:

| Data concerned  | Storage time  |
|---|---|
| Managing lists of sales prospects   | 3 years from date of collection by Eutelsat, or the last contact from the sales operation |
| Managing customer files   | Length of the commercial relationship + 5 years   |
| Contacting former customers   | Length of the commercial relationship + 3 years   |
| Financial and other documents (order, delivery, invoicing, etc.)  | 10 years from the date of creation  |
| Banking data for the purposes of compiling and using as evidence in the event of a possible challenge to the business transaction | 13 months from the date of the debit transaction  |
| Telephone recordings  | 6 months from the date of recording   |
| Statistical and audience measurement data   | 13 months   |
| Identity documents received within the scope of a login request   | 12 months   |

At the end of the periods listed above, your Personal Data will either be deleted or anonymised. As an exception to the information in the table above, in the event of pre-litigation or litigation, all or some of your Personal Data may be retained for a longer period of time if it is deemed useful for said pre-litigation or litigation.

#### Article 6. Where will my Personal Data be processed?

The Personal Data collected are processed by Eutelsat and its third-party suppliers (as provided by the European General Data Protection Regulation) within the European Union.

#### Article 7. How do we ensure the security of your Personal Data?



Eutelsat ensures that your Personal Data are securely processed in compliance with regulatory and legal requirements including during some operations by third-party suppliers. To this end, appropriate technical and organisational measures are put in place by Eutelsat and any third-party supplier to ensure the security associated with the processing of your Personal Data.

## **Article 8. What are my rights and how do I exercise them?**

On condition of the limits provided by regulations, you enjoy a number of rights with regard to the processing of your Personal Data:

- The right to be informed on the use of your Personal Data;
- The right to access your Personal Data that we hold about you;
- The right to request the correction of incorrect or incomplete Personal Data;
- The right to request the deletion of your Personal Data;
- The right to request the limitation of the processing of your Personal Data;
- The right to refuse the processing of your Personal Data for legitimate reasons;
- The right to request the portability of your Personal Data;
- Regarding processing requiring consent, you have the right to withdraw Your consent at any moment;
- The right to specify what happens to your Personal Data after your death.

Please direct any questions regarding exercising your rights by post to the following address: Eutelsat S.A. – DPO Service konnect – 32, Boulevard Gallieni - 92130 Issy-les-Moulineaux or send an email to the following address: [dpo@konnect.com](mailto:dpo@konnect.com).

In case of a complaint to which Eutelsat cannot give a satisfactory response, you have the right to contact the French national Data Commission (Commission Nationale de l'Informatique et des Libertés française - CNIL): <http://www.cnil.fr> or the Information Commissioner's Office (<https://ico.org.uk/>).

Furthermore, consumers may sign up free of charge to a list prohibiting third parties contacting them by telephone for marketing purposes by visiting the website <https://www.tpsonline.org.uk/>.

Last updated 2 November 2020