

# **Orange Belgium Privacy Policy**

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## 1. Data protection policy

Orange Belgium wishes to be recognised by its customers, employees and partners as an operator that deals responsibly with personal data. It is therefore important for Orange Belgium, whose mobile and fixed networks receive ever increasing amounts of personal data to process, to properly protect these data. Orange Belgium assumes the following clear and strict obligations in order to handle these data with respect for the privacy of its customers:

- **Security:** the personal data of our customers are securely stored and reliably processed
- **Control:** the customer will be able to control and consent to how his personal data are used
- **Transparency:** the data are transparently processed through all phases of our relationship with the customer
- **Support:** Orange Belgium helps its customers to even better protect their privacy and to better manage their personal data

In the following sections you will learn how Orange Belgium concretely realises these guarantees for its services. Orange Belgium hereby complies with the applicable privacy legislation. This is monitored by the Belgian Data Protection Authority.

## 2. Scope of application of this policy

The privacy policy of Orange Belgium applies to all customers of Orange Belgium who use products and services of Orange Belgium. Not only private customers but also business customers and their end users fall within this category. The products and services of Orange Belgium are the following: telephony (both mobile and fixed), internet connection (both mobile and fixed), television services and Orange Smart Home. This policy also applies to visiting the Orange Belgium website, using the apps that Orange Belgium makes available and the Orange Belgium stores.

## 3. The processing of personal data of customers and end users

### 3.1. General

For the exercise of its activities, Orange Belgium processes several types of personal data as the controller and receives these personal data in different ways. Some personal data are made available to Orange Belgium by the customer himself, while other personal data are obtained through the services that Orange Belgium provides.

Orange Belgium does not process any sensitive personal data linked to health, sexual orientation, political opinions, ethnic origin and religious or philosophical beliefs.

The collected data are stored and managed in systems that are controlled by Orange Belgium SA/NV, Bourgetlaan 3, 1140 Brussels.

3.3. What personal data does Orange Belgium process and what are they used for?

<b>Processing</b>	<b>Activities</b>	<b>Type of data</b>
Contract management	Preparation, modifications and management of the contract with the customer	Identification data <sup>1</sup> National register number ID number
Customer relations management	Support of the customer (proactive & reactive). Invoicing of the services used by the customer. Customer support	Identification data Consumption data Contact with the customer service department Technical data Financial data
Safety	In order to guarantee the safety of personnel and customers in our stores and offices. In order to guarantee safe access to the services of Orange	Camera images  Access data
Fraud control	In order to detect and combat fraud and abuse by customers or third parties.	Consumption data Identification data
Dispute management	Management of disputes regarding invoicing and payment.	Identification data Financial data
Direct marketing	In order to inform the customer about related or new products and changes to Orange Belgium's existing products and services In order to participate in Orange Belgium's loyalty programme, which offers the customer advantages and gifts. In order to conduct market research. In order to determine what market segment the customer belongs to.	Identification data Consumption data
Network management	In order to improve the services offered by Orange Belgium and optimise the quality of the network. To support the customer (proactively & reactively) in case of technical problems.	Technical data Consumption data
Support for the Ministry of Justice and security services	The legal obligation to provide information at the request of the Ministry of Justice and security services	Identification data National register number ID number Consumption data Location data

<sup>1</sup> These data can be collected by means of reading out or a copy of the ID document.

		Camera images
BE-Alert	The legal obligation, at the request of the crisis centre, to send a text message to customers present in a crisis zone	Telephone number Location data

▪ **Identification data**

When the contract is concluded, Orange Belgium collects identification data from the customer: name, address, date of birth, sex, language, telephone number(s), ID card number, national register number and e-mail address (optional). These data are gathered either in a point of sale, via the internet or by the telesales agents. In the store, the sales employee reads these data off from your eID card. Other data that are contained on the eID card are not saved by Orange Belgium.

As soon as the contract is concluded, Orange Belgium also allocates to each customer a customer code that will serve as an identification number.

When using services, Orange Belgium records - as provided by international standards and in order to guarantee an optimal customer service - the customer's IMEI number (International Mobile Equipment Identifier). This number identifies in a unique manner the customer's device (as well as the type of device being used).

What are these data processed for?

- In order to activate the ordered services, to use the services and manage the contract
- In order to provide the invoice for the services
- In order to be able to make contact if problems arise.
- In order to be able to identify the customer when he calls us with certain questions. In this way we are sure that we are providing information to the right person, and no one else.
- In order to manage potential disputes.
- In order to prevent and combat fraud or abuse.
- In order to inform the customer via direct marketing about similar products or new products, as well as about changes to Orange Belgium's existing products and services. Orange Belgium will pass on this information by post, e-mail, SMS or directly via the customer service department.

For these direct marketing activities Orange Belgium complies with the privacy legislation and subscribes to the ethical code of the Belgian Direct Marketing Association.

- In order to do market research, to manage Orange Belgium's loyalty programme and to identify the market segment.

Who has access to these data?

- These data are accessible for the employees of Orange Belgium's customer service department and by sellers when they are in contact with the customer.
- The Ministry of Justice and security services can demand the identification data of a customer.

▪ **Access data**

As part of the use of services by the customer, the following access data are saved on the systems of Orange Belgium. This information is made illegible by means of encryption techniques and can only be read by systems that have to use this information:

- The PUK code of your SIM card
- Login for the customer zone, no password

What are these data processed for?

- In order to guarantee secure access to the services.

Who has access to these data?

- These data are accessible for the customer service employees and sellers when they are in contact with the customer.



▪ **Consumption data**

If you use the mobile and fixed telephony or internet services of Orange Belgium, Orange Belgium will collect consumption data for each call or each internet connection. These consumption data include:

- Monthly subscription costs for the products and services
- Addressee, device identification, date and duration of the call or date of a telephony service,
- Duration, destination and consumed volume of an internet session,
- Type, date and cost of paying services; for example, SMS parking ticket, SMS public transport ticket, additional TV services, etc.

What are these data processed for?

- We will be able to invoice the customer on the basis of the consumption.
- On the basis of the consumption we can make suggestions for subscriptions or bundles that better match the manner of communication and use.
- On the basis of the technical data of the device we can assist the customer in solving problems (proactively & reactively).
- Detecting and preventing fraud.

Who has access to these data?

- These data are accessible for the customer service employees and sellers when they are in contact with the customer.
- The Ministry of Justice and security services can demand the consumption data of a customer.

▪ **Communication (via the telephone network and via the mobile internet network)**

The personnel and the partners of Orange Belgium do not have access to the content of the customer's communication on the Orange Belgium network, such as the content of a call, e-mails or text messages, etc. These communication data are encrypted when they are sent out over the Orange Belgium network. This encryption is a protective measure designed to keep the content of the communication secret. These data are protected by the duty of telecommunication secrecy.

▪ **SMS and voice mail**

As part of the telecom services, the following data are temporarily saved on Orange Belgium systems:

- Outgoing messages (SMS and MMS), during the period in which they could not be delivered to the recipient and for a maximum of 72 hours.
- Voice mail: not listened-to messages for a maximum of 2 to 4 weeks; listened-to messages for a maximum of 1 to 2 weeks or until the customer has deleted them.

What are these data processed for?

- In order to make it possible to provide telecommunication services.

Who has access to these data?

- These data are not accessible for personnel who work at Orange Belgium, and under no circumstances does Orange Belgium have access to the content of SMS and voice messages.



- **Financial data**

When the contract is concluded, Orange Belgium collects the account number for activating the direct debit. During the term of the contract Orange Belgium maintains the customer's payment data and, for prepaid customers, the payment or reloading history.

What are these data processed for?

- For implementing the payment of the invoices.
- As a result we can verify whether the performed services and the purchased products have also been paid for by the customer.
- On the basis of the bank account number we can link a payment to the account, if the structured message is missing.

Who has access to these data?

- These data are accessible for the customer service employees and sellers when they are in contact with the customer.

- **Contact with the customer service department**

Orange Belgium also maintains a history of the customer's contacts with the customer service department or an employee in a store: date, reason and brief description of the contact.

Calls to the Orange Belgium customer service department can be recorded.

Also, all communication that takes place with the customer service department - such as telephone calls, e-mails, social media and contact forms - is retained

What are these data processed for?

- In this way the customer service department can check whether you already had a complaint earlier and thus offer you a better solution.
- Each contact with the customer is very important for Orange Belgium and these data help to optimise the provision of services, to measure the effectiveness of the services, to improve the quality of Orange Belgium's customer service, to detect regularly recurring complaints and to work out a structural solution.
- These data can also be used as evidence in commercial disputes.

Who has access to these data?

- These data are accessible for the customer service employees when they are in contact with the customer.
- The recordings of telephone calls with Orange Belgium's customer service department are only accessible for Orange Belgium's customer service coaches.

▪ **Technical data**

When using the services, the mobile and fixed network and the devices generate technical data: for example, the actual download speed, broken-off connections, device malfunctions, etc. All of these technical data are brought together.

What are these data processed for?

- On the basis of the technical data, the technical services can assist the customer in solving problems (proactively & reactively). For example, one can verify whether this is a malfunction of the network, the device, etc. In this way, the customer can be offered a well-targeted solution.
- In order to monitor the quality and performances of the network and the related services, solve problems and optimise the performances.

Who has access to these data?

- These data are available for the technical experts of the customer service department and technical teams of Orange Belgium. These data can only be read with the help of the right technical applications.

▪ **Localisation data on the antenna level**

Localisation data are also generated for each call or each internet connection. Localisation data indicate which transmission tower or connection point (router, WiFi point, etc.) the device is connected to. These data are temporarily saved by Orange Belgium, before being anonymised and used. Orange Belgium has no applications that use localisation data associated with an individual.

What are these data processed for?

- These data are not used by Orange Belgium before being anonymised, the process that eliminates the link with the customer. As a result, these data can no longer be connected with an identified or identifiable person.
- The BE-Alert messages are based on the location data of the customer

Who has access to these data?

- The Ministry of Justice and security services can demand the location data of a customer.

▪ **Localisation data via triangulation**

Orange Belgium has the legal obligation, at the request of the Ministry of Justice and security services, to determine the precise location of a device via triangulation. For example, in the case of a disquieting disappearance that is being investigated. This location determination is done in real time and the data are not saved by Orange Belgium.

What are these data processed for?

- Only in order to satisfy a legal obligation to assist the Ministry of Justice, security and emergency services.

Who has access to these data?

- The Ministry of Justice, police and emergency services can demand the location data of a customer.

- **National register number and ID number**

Orange Belgium has the legal obligation to collect the national register number, upon the conclusion and modification of a contract, for identification of the customers (pre- and post-paid).

What are these data processed for?

- The national register number is used in order to, via the website of the BIPT, request a social tariff for the customer.
- The national register number and ID number are only stored, not further used by Orange Belgium and are protected via encryption.
- The Ministry of Justice and security services can demand the national register number and ID number of a customer.

Who has access to these data?

- These data are accessible for the customer service employees of Orange Belgium and for the sellers when activating the contract.
- The Ministry of Justice and security services can demand the national registration number and the identity number of a customer.

- **Copy of ID document**

Orange Belgium has the legal obligation to keep a copy of non-Belgian ID documents for identification of the customers (pre- and post-paid).

What are these data processed for?

A copy of non-Belgian ID documents is only stored, can be requested by the Ministry of Justice and security services, and is not otherwise used by Orange Belgium.

Who has access to these data?

- These data are accessible for the customer service employees of Orange Belgium and for the sellers when activating the contract.
- The Ministry of Justice and security services can demand the national registration number and the identity number of a customer.

- **Copy of eID document**

Via the E-shop or in the store<sup>2</sup> the customer can be asked to provide a copy of his Belgian eID document for drawing up or modifying the contract.

What are these data processed for?

- A copy of a Belgian eID document is only used for drawing up or modifying the contract and is then removed.

Who has access to these data?

- These data are accessible for Orange's customer service employees only when activating the contract.

- **Camera images**

Orange Belgium has cameras installed in its stores and offices. The presence of these cameras is always clearly indicated visually.

What are these data processed for?

- The cameras in the stores and offices are there to ensure the safety of both personnel and customers.

Who has access to these data?

- The images are only passed on to the police if the latter ask for them.

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<sup>2</sup> Only if the eID document cannot be read electronically.

- The images can be viewed by the security agents called upon by Orange Belgium in the event of suspected fraud by Orange Belgium personnel.

#### 3.4. Does Orange Belgium use anonymous personal data?

Anonymous and aggregated technical data are used in order to analyse the traffic on the Orange Belgium network and optimise the network and services of Orange Belgium.

Anonymised localisation data are used in order to analyse the presence and movement of groups of people. This is always done in response to a specific demand, for a certain area and a particular period. The analyses are performed by a third party by order of an end user. The end user receives only the final reports and never the anonymous data, which are also destroyed at the end of the analysis.

#### 3.5. Are personal data passed on, shared with or sold to third parties?

At Orange Belgium we keep your personal data confidential and share them only with external recipients in the way we have described in this section.

Orange Belgium will not sell the personal data of its customers to commercial partners.

Orange Belgium has outsourced some of the call centre, invoicing services and IT activities. Moreover, Orange Belgium calls upon independent commercial agents authorised by Orange Belgium for customer data management and customer advising.

These partners have access to the personal data in Orange Belgium's possession, but this access is limited to the scope of application of those outsourced activities and is monitored by Orange Belgium. Some of the call centre and IT activities were outsourced to partners who are established outside of Europe. The personal data are always protected and processed in accordance with the standards defined by Orange Belgium. Orange Belgium has made the necessary agreements with these partners in order to also be able to effectively guarantee that the measures are being complied with.

If the customer gave his consent to publish his telephone number(s) in the telephone directory, then some identification data are shared with the provider of this directory. The customer can have his number deleted from the telephone directory via his customer zone or by calling the customer service department. It can take a certain time before the fulfilment of his request becomes apparent.

Within the context of a (judicial) investigation, Orange Belgium is obliged by law to communicate identification data and consumption data at the request of judicial authorities and security services.

#### 3.6. Does Orange Belgium buy personal data from third parties?

Orange Belgium buys personal data in order to support the pre-sales activities from

- Roularta Media
- Bisnode
- Google Adwords
- Facebook
- Egentics

#### 4. Does this also apply for B2B customers?

This privacy policy also applies for each individual customer (end user) of a B2B tariff plan.

Orange Belgium will not contact the individual customers (end users) who use a B2B tariff plan. Any contact will take place via the customer's fleet manager and other contact persons (a person involved in the telco contract administration).

Anonymous and aggregated data for mobile and data traffic are used for analysing the traffic on the Orange Belgium network and for optimising the Orange Belgium network and the services.

#### 5. How are my personal data protected?

Orange Belgium has implemented security measures (appropriate technical and organisational measures) that are adapted to the sensitivity level of the personal data as protection against malicious break-in, loss, adaptation or disclosure to third parties who have not received consent for this. These security measures are evaluated at least once a year and adjusted where necessary.

Access to the information systems of Orange Belgium is reserved for persons who require such access for their work.

Orange Belgium teaches its employees to protect the personal data that they get to see for their work and obliges them to comply with the applicable rules and ethical standards of the company.

Orange Belgium performs controls and audits in order to verify that these rules are being correctly followed.

Orange Belgium demands of its suppliers that they follow the security principles of Orange Belgium. For this Orange Belgium concludes the necessary contracts with its suppliers in order to be able to guarantee that they are effectively complying with these security principles.

#### 6. How long are the data retained?

Orange Belgium keeps the data of its customers for no longer than necessary in view of the purpose for which they were collected. Orange Belgium defines the proper retention period on the basis of the quantity, nature and confidentiality of the personal data, and as soon as the retention period expires, Orange Belgium deletes the relevant personal data or renders them anonymous. If Orange Belgium is unable to do this for technical reasons, we make sure that appropriate measures are taken in order to prevent further use of the relevant personal data.

Hereby account must also be taken of the fact that, under the law, certain data must be preserved for a particular period.

- The identification data of the customer (name, address, etc.) are kept for 10 years after termination of the contract. These data are still used only if necessary in order to be able to identify the person as a former customer.
- A copy of the eID document is only kept while drawing up or modifying the contract (maximum of 2 days).
- Consumption and technical data are kept for 3 years.
- Contact details with the customer service are kept for 3 years.
- The customer's invoicing and financial data are kept for 8 years for tax reasons.
- Camera images are kept for 30 calendar days.
- Conversations with the customer service department are kept for 3 months.
- The Ministry of Justice and security services can demand identification data, the national register number, ID number and a copy of the ID document of the customer up to a maximum of 12 months after termination of the contract. The consumption data can be requested for at most the past 12 months, counting from the day of the request.

## 7. On what legal grounds are the processing operations based?

Below you will find a concise overview of the legal grounds (GDPR art. 6) on which Orange Belgium bases the personal data processing operations. You can always ask the Data Protection Officer for additional information via: [privacy.officer@orange.be](mailto:privacy.officer@orange.be) .

Processing	Legal basis
Contract management	Performance of the agreement or the contract
Customer relations management	Performance of the agreement or the contract
Security of the services	A legal obligation The justified interests of Orange Belgium or of a third party.
Fraud control	A legal obligation The justified interests of Orange Belgium or of a third party.
Dispute management	A legal obligation The justified interests of Orange Belgium or of a third party.
Direct marketing	The justified interests of Orange Belgium or of a third party. Consent for prospects
Network management	A legal obligation
Support for the Ministry of Justice and security services	A legal obligation
BE-Alert	A legal obligation
The delivery of services	Performance of the agreement or the contract
Improvement of the services	Performance of the agreement or the contract
Statistics and reporting	Processing of anonymous data
Managing identity, user account and authentication	Performance of the agreement or the contract

## 8. What about the website of Orange Belgium?

### 8.1. Registration of personal data

Orange Belgium registers the personal data that are communicated via [www.OrangeBelgium.be](http://www.OrangeBelgium.be) in databases that belong to the company. These data can be used for processing the requests submitted via the website (including job applications). Orange Belgium can call upon third parties to conduct market studies, marketing or direct marketing actions or certain services via sub-contracting or cooperation contracts. Orange Belgium communicates the personal data that are provided via the website to these third parties only to the extent that this is necessary for the performance of the assignments that are entrusted to them and only for the purposes of this performance.

In case of access to the website via the internet and during each communication of personal information, the communication is protected by powerful, tried-and-tested encryption technologies. This is the encryption of the data that was discussed earlier in this policy.

## 8.2. Does Orange Belgium use cookies?

For more information about how Orange Belgium uses cookies on its website, see <http://www.Orange.be/nl/cookies> or <http://www.Orange.be/fr/cookies>.

## 9. What about the My Orange app of Orange Belgium?

The My Orange app does not collect additional data from the consumer. Certain personal data from the IT systems of Orange Belgium are necessary in order to enable the app to function. After all, My Orange must be able to e.g. indicate how much the customer has consumed or which products are activated. The customer's personal data are necessary in order to be able to fulfil these functions. The apps of Orange Belgium fall within the scope of application of this privacy policy, thus the processing will be done in accordance with this policy.

### 9.1. General

"The Service gathers information on the use of the application and passes this information on to us for statistical analysis and in order to improve the application and the corresponding services. All gathered information is completely anonymous and not linked in any way with the User. This information is collected and processed in accordance with the applicable laws. It is not used for any purposes other than to improve the application and the corresponding services. No personal data are collected. You can put a stop to the collection of the use information at any desired moment. Via the settings of your device, an option in the settings of the Service is available for this purpose.

Unless expressly stated otherwise in the description of the Service, Orange Belgium does not process the personal data of its customers during the downloading, installation or use of the Service. When your personal data are processed, Orange Belgium assures you that the processing takes place in accordance with the European Regulation 2016/679, the General Data Protection Regulation (GDPR). Your personal data are used exclusively with a view to a proper performance of the Service or with a view to objectives that are expressly set forth in the description of the Service. The controller is Orange Belgium nv, Bourgetlaan 3, 1140 Evere. Unless expressly stated otherwise in the description of the Service, Orange Belgium does not use your personal data for direct marketing purposes. In the event that your personal data are used for direct marketing purposes, you can object to this free of charge and without needing to provide any reason for doing so. You have the right to inspect and modify your personal data at any time."

## 10. What about the Smart Home applications of Orange Belgium?

### 10.1. General

Orange Belgium's Orange Smart Home services and applications fall within the framework of this privacy policy and the processing of personal data also takes place in accordance with this policy.

Given the specificity of the Orange Smart Home service and application - i.e. the service and application of Orange Belgium, whereby customers can operate connected objects that are installed in their home from their smartphone, in order to optimise their comfort and facilitate their day-to-day life and that of their family - certain personal data processing operations supplement the treatments identified in the previous points.

The purpose of this section is thus to inform the customer about how Orange Belgium, its subcontractors and potential partners process the personal data within the specific context of using the Orange Smart Home application and services. The collected information enables Orange Belgium to provide and improve the service so as to make it even more efficient and enable the customer to have the best possible user experience.

### 10.2. What personal data does Orange Belgium process and what are they used for?

Processing	Activities	Type of data
Managing identity, user account and authentication	<p>Managing and verifying the customer's identity</p> <p>Enabling customers to connect with our products and services</p> <p>Processing requests to terminate and deactivate services</p>	<p>Account and profile data:</p> <ul style="list-style-type: none"> <li>• Identification and contact details (required): user name and login data, e-mail address, telephone number</li> <li>• Personal characteristics (optional): nickname, avatar/profile photo, country code, time zone</li> </ul>
The provision of services	<p>Allowing interaction between connected objects.</p> <p>Allowing the customer to remotely control connected objects</p> <p>Allowing the customer to make use scenarios and to use the functions that are offered by the mobile app.</p>	<ol style="list-style-type: none"> <li>1. Account and profile data (see above)</li> <li>2. Information about the smartphone</li> <li>3. Log information: connection, use and interaction data with applications and services</li> <li>4. Information relating to smart devices/connected objects (including camera images if a camera is installed by the user)</li> <li>5. User scenarios (optional)</li> <li>6. Location data (optional)</li> </ol>
Customer relations management	<p>Customer support (proactive and reactive).</p> <p>Responding to questions and complaints.</p> <p>Management of the after-sales service.</p>	<ol style="list-style-type: none"> <li>1. Account and profile data (see above)</li> <li>2. Contacts with the customer service department</li> <li>3. Log information: connection, use and interaction data with applications and services</li> </ol>



Improvement of the services	Developing and optimising our products and services. Analysing the effectiveness of our products and services	<ol style="list-style-type: none"> <li>1. Information relating to smart devices/connected objects</li> <li>2. Log information: connection, use and interaction data with applications and services</li> </ol>
Statistics	General statistics about the use of our products and services and connected objects	Aggregated and anonymised data
Security of products and services	Guaranteeing the proper functioning and security of our products and services. Preventing and tracking fraudulent or inappropriate use.	<ol style="list-style-type: none"> <li>1. Information about the smartphone</li> <li>2. Information relating to smart devices/connected objects</li> <li>3. Log information: connection, use and interaction data with applications and services</li> </ol>
General communication	Providing information about the evolution of the used products and services, general terms and conditions/policy and other administrative information.	Account and profile data (see above)
Marketing communication	<p>Providing information in order to promote our services and products (e.g. new products)</p> <p>Analysing the use of the Services in order to make personalised proposals to the customer</p> <p>Offering contests</p> <p>Conducting polls or surveys about the use of services and products</p>	Account and profile data (see above)

Depending on the individual case, Orange Belgium processes the customer's personal data, collected directly from the customer or as a consequence of the use of products or services. In order to be able to provide the services, Orange Belgium asks the customer to furnish certain personal data that are necessary for providing the services. If the customer decides not to furnish them, Orange Belgium might not be able to fully deliver the services (or certain of their functions).

Orange Belgium collects the following data:

## 1. Information provided by the customer

- **Account or profile data:** If you create an account, we will collect your identification data and contact details, such as your name, telephone number, user name and login data. During your interaction with our products, we can collect your nickname, profile photo, country code, language preference or time zone data in your account.

### What are these data processed for?

- Managing and verifying your identity and user account: we process your account and profile data so that we can verify your identity when you use our products and services.
- Delivering and operating the products and services that you requested or purchased.
- Sending you important information about the Services, changes in our general terms and conditions and policy rules and/or administrative information. Because this information can be important, you mustn't unsubscribe from receiving these messages.
- Providing you with marketing and promotional material for our products and services.

### Who has access to these data?

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer.
- **Comments:** When you use the comments and suggestion functions in our products, we collect your e-mail address, mobile telephone number and the content of comments in order to solve your problems.

### What are these data processed for?

- Dealing with questions/claims and offering after-sales service.

### Who has access to these data?

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer.
- **User scenarios:** When you use automation functions or prepare scenarios, we collect your settings information so that the application can offer you intelligent scenario services.

### What are these data processed for?

- Delivering and operating the products and services that you requested or purchased.

### Who has access to these data?

- These data are only accessible via the app.

## 2. Automatically collected information

- **Device information (smartphone or tablet):** When you interact with our product, we automatically collect information on the device, such as the model, the operating system, the unique ID of the device, the IP address, the software release number, the access type and the model, etc. This is essential basic information that we must collect from you.

### What are these data processed for?

- Delivering and operating the products and services that you requested or purchased.
- Dealing with questions/claims and offering after-sales service.

### Who has access to these data?

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer and by the technical support department.
- **Log information:** connection, use and interaction data with the application and the services. During your interaction with our services we automatically collect use data which can reveal a part of your lifestyle (opening and closing of doors and windows, switching on lights, etc.) as well as a history of connections.

**What are these data processed for?**

- Delivering and managing the products and services that you requested or purchased.
- Developing and improving our products and services and corresponding offers, and analysing the efficiency of our activities.
- Dealing with questions/complaints and offering after-sales service.
- Guaranteeing the functions and security of our products and preventing and detecting fraudulent or inappropriate use.

**Who has access to these data?**

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer and for the technical support department.

- **Information about your location:** your location data are used when you use services or functions that are based on location data, e.g. use the functions in order to set up scenarios with the help of the geographic location of your device (also called "Geofencing"). We use the "Geofencing" functions that are made available by the operating systems of mobile Android and iOS devices. Geofencing is a technology with which actions can be carried out depending on the positioning of the device in a pre-defined area. You define these geographical areas and the actions to be performed yourself. At absolutely no time are your location data stored by the app, nor communicated outside the app.

These data are only used if you gave your consent for such processing, i.e. when you activate location functions via the privacy settings of your mobile device. Orange Belgium will therefore first ask for your consent in order to gain access to the location of your device so as to activate certain functions, even if the application is closed or not in use.

You can unsubscribe from this use of your location data by managing the privacy settings on your mobile device, after which we will stop using your location data.

#### What are these data processed for?

- In order to enable the products and services that you requested or purchased to function.

#### Who has access to these data?

- On the basis of your consent, when you activate the location function on the app, the location data of your mobile device are generated and shared with the services Google Maps (on Android) and Apple Maps (on iOS). Take into account that both Google Maps and Apple Maps have their own data protection measures, thus we invite you to read their privacy policy for more information.
- **Statistics:** On the basis of anonymous data, we collect statistics about the use of the functions of our products and services.

#### What are these data processed for?

- Processing of your data for statistical and reporting purposes. In this case, all data are anonymised in advance.

#### Who has access to these data?

- These data are accessible for the marketing department

### 3. Information about (smart and connected) peripheral devices

- **Basic information on smart devices:** when you connect your smart devices with our products or services, these will collect basic information on smart devices, such as device name, device ID, online status, time, activation code, firmware version and update information.

#### What are these data processed for?

- Delivering and managing the products and services that you requested or purchased.
- Developing and improving our products and services and corresponding offers, and analysing the efficiency of our activities.
- Guaranteeing the functions and security of our products and preventing and detecting fraudulent or inappropriate use.
- Dealing with questions/complaints and offering after-sales service.

#### Who has access to these data?

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer and for the technical support department.

- **Information processed by smart devices:** depending on the various smart devices that are connected to our products or services, we can collect different data from your smart devices. For example, the image or video that is obtained by your camera is collected and used in order to offer you mobile monitoring and alarm services.

For what purposes are these data processed?

- Delivering and managing the products and services that you requested or purchased.
- Developing and improving our products and services and corresponding offers, and analysing the efficiency of our activities.
- Guaranteeing the functions and security of our products and preventing and detecting fraudulent or inappropriate use.
- Dealing with questions/complaints and offering after-sales service

Who has access to these data?

- These data are accessible for Orange Belgium's customer service when they are in contact with the customer and for the technical support department.

10.3. Are personal data passed on, shared with or sold to third parties?

This section is a supplement to paragraph 3.5 specifically for the "Smart Home" service.

Your personal data can be shared with the suppliers that provide you, directly or indirectly, with your smart devices and/or networks and systems with which you receive access to our sites and services.

If, for example, you link smart peripheral devices of the Google brand (e.g. Google Nest, Mini or Hub), information is exchanged between Orange and Google via the Google Home app which is synchronised with our Orange Smart Home app. Google then processes your personal data in accordance with the Google privacy policy, which we invite you to read.

10.4. Are personal data processed outside the European Union?

It is possible that the collected data are processed outside the European Union. In that case Orange Belgium takes the necessary measures with its subcontractors and partners in order to guarantee an appropriate level of protection of your data, and this in full compliance with the applicable regulations.

If the subcontractors and partners involved are not established in a country whose legislation is deemed to offer adequate protection, they will first have signed the "standard contract provisions" of the European Commission or they will be subject to binding internal rules approved by the authorities.

10.5. How long are personal data kept?

Personal data are stored in accordance with the indications in section 6 of this privacy policy.

Information relating to Smart Peripheral devices / connected objects and log information: connection, use and interaction data of the Application and Services are kept for a maximum of 3 months.

## 11. What about the Device Manager applications of Orange Belgium?

### 11.1. General

The Device Manager application is one that is offered by Orange Belgium as part of the Device Manager services which are purchased by a B2B customer. The Device Manager application works together with the Device Manager server that is used by the B2B customer to manage the mobile devices.

The application is installed on the mobile device (smartphone/tablet) of the user (employee of the B2B customer) and the Device Manager service gives the Fleet Manager of the B2B customer the possibility of managing the mobile device. With the Device Manager service the user can also himself perform management actions on the mobile device, via the user portal.

The purpose of this section is therefore to inform the user about the collection of their personal data by Device Manager and the ways they are used by the application.

As part of the Device Manager services Orange Belgium acts as subcontractor. For any other question concerning the use of his personal data and/or request to exercise rights relating to the processing of his personal data, the User will therefore have to directly contact the B2B customer, which acts as controller.

## 11.2. What personal data does Orange Belgium process and what are they used for?

Your personal data are only used for the use of the Device Manager application. They are not used for commercial canvassing purposes.

The application processes the following data:

- **Identification**

When the application is started, you must enter your mobile number. This number is stored in the application in order to identify you to the Device Manager server whenever you are connected with the application.

Device Manager also recognises the operating system and model of your smartphone or tablet and sends this information to the Device Manager server.

- **Contacts and Calendar**

The application has access to these data, but only in order to delete them, when you or your business manager send the "Delete data" order from the Device Manager portal.

The app does not read the content of your address book and agenda.

- **Access to the device**

The application can download, install or remove applications on your mobile device by order of the fleet manager.

The application can also erase the data on the memory card, if you or the fleet manager of your company send the "Delete data" order from the Device Manager portal.

- **Data stored by the Device Manager server**

The Device Manager server can read the following information, so that your organisation can remotely manage your mobile device. It is the fleet manager who defines and manages this list of data.

- IMEI number of the mobile phone
- uses data network: name of WiFi network or 4G / H + / 3G / EDGE mobile network
- list with configured data connections
- list with installed applications
- list with configured e-mail accounts
- roaming status (mobile connected to a network abroad)
- ...

This information is stored on the server and can be viewed via the web portal by the fleet manager of your company.

In the case of termination of the Device Manager service on the device, your user account is deleted and the data that are stored on the server are erased.

If the device is managed in Android Enterprise / Managed Professional Space mode, Device Manager can only see the applications that are installed in the professional space.

- **Location data**

The Device Manager server can request the geographical position of your device when you log in on the user portal of the Device Manager.

The geographical position of the device can also be consulted by the fleet manager of your company from the Device Manager portal, in the following cases:

- if the device is exclusively for professional use (i.e. managed in Android Enterprise / Fully managed device mode), and only after it is blocked in "Lost Mode";
- if a "professional profile" is activated on the device (managed in Android Enterprise / Managed Professional Space mode);
- or if the device is managed in the "without Android Enterprise" mode, and you have allowed the location from the user portal of the Manager Portal.

In all of these cases you are informed by e-mail that the device is localised from the Manager Portal.

## 12. What about the presence of Orange Belgium on social networks?

Orange Belgium has a company page on various social networks (including Facebook, Instagram, Twitter and LinkedIn). These pages are only used in order to more actively communicate with you and inform you about our products and services.

When you send us personal data via the functions of a social network, they are only used in order to answer your question or follow up on your request. If you are a customer at Orange Belgium, your data in this case can be stored in our computer system with a view to managing our customer relationship. Depending on the case we process your personal data on the basis of our legitimate interest in the communication with visitors to our page, on the basis of the contract that we have with our customers, or in order to take the necessary pre-contractual measures.

Data that you post on the public pages of a social network are visible for other users. So only share personal or confidential information in private mode or in a direct communication with a customer service employee.

We also draw your attention to the fact that when you visit our social network page, cookies are generally installed on your device by the social network in question. These cookies register your surfing behaviour and interests. The personal data that are collected by these cookies are then used for statistical analysis and marketing purposes (in order to offer you targeted ads that are thought to correspond to your interests). Orange Belgium has no control over or access to the personal data that are collected by the various social networks.

Therefore we wish to point out to you that you must address the social network involved for any questions relating to the processing of your data by these social networks, or in order to exercise your rights relating to your data, since only the social network has direct access to and control over the personal data that are collected via the use of our pages, and can therefore take the necessary steps.

For more information about the handling of your personal data by the various social networks, consult the privacy statement of these social networks or contact the social network involved directly.



## 13. User profile and automated decisions

Orange uses the consumption data of its customers in order to draw up a user profile of its customers and to divide them into market segments. On the basis of this profile Orange Belgium will offer the customer personalised gifts via the Orange Thank You programme or propose a better tariff plan. It always remains the decision of the customer to accept this gift or tariff plan or to opt for a different tariff plan. The final decision always lies with the customer, thus Orange Belgium makes no (automated) decisions in the customer's place.

As explained below under the heading 'Management of the consent', the customer can choose to withdraw his consent for this processing or not to participate further in the Orange Thank You programme. Orange Belgium is legally required at regular intervals to communicate the best tariff plan on the invoice of each customer, as well as to give the customer the possibility to share consumption data and profile at the customer's request with the telecom regulator's tariff simulator.

## 14. What are my rights as a customer?

On the basis of the privacy directive, each customer has various rights that they can exercise vis-à-vis Orange Belgium. These requests are always handled as quickly as possible, and certainly within a period of one month. This period can be extended by two months if the request is complex or because Orange Belgium has many requests to deal with. The customer is informed if the period has to be extended and also learns the reason for this.

The customer can exercise these rights by sending a signed and dated request together with a copy of his ID card to the Data Protection Officer of Orange Belgium via the Legal Department, Bourgetlaan 3, 1140 Brussels or by sending the same data electronically to [privacy.officer@Orange.be](mailto:privacy.officer@Orange.be) Orange Belgium requires a copy of the ID card in order to be able to identify the customer. This ensures that customer data do not fall into the wrong hands.

### 14.1. Inspecting data

The customer has the right to receive an overview of his personal data and the processing operations by Orange Belgium.

The customer can receive a copy thereof. This copy is free, but Orange Belgium can charge administrative costs for each additional copy that the customer requests. This copy will be sent electronically if the request is submitted electronically. Nevertheless, the customer can indicate in his electronic request that he would prefer not to receive the copy electronically.

The customer can hereby ask for additional information about:

- The purposes of the processing
- The categories of personal data
- The recipients to whom the personal data are provided
- The retention period
- The source of the data if they were not collected directly from the customer

### 14.2. Rectifying or completing data

The customer has the right to have incorrect data corrected or to complete incomplete personal data. This can be the case when the information is e.g. wrong, incomplete or out of date.

The customer himself can change certain personal data via his customer zone or have them changed by the customer service department.

### 14.3. Having data erased or the right to be forgotten

The customer can ask Orange Belgium to remove his data if:

- These data are no longer used for the purpose for which they were collected
- The customer has withdrawn his consent for the processing and there is no other legal ground present in order to justify the processing
- The customer objects to the processing of his data and there are no other justified grounds for the processing that outweigh his objection
- The customer's data are being illegally processed
- The data must be erased in order to fulfil a legal obligation

The customer cannot ask that his data be removed in any situation other than those described above. Thus the customer cannot ask for his data to be erased if:

- The data are necessary in order to comply with a legal obligation or to fulfil a mission of general public interest
- The data are required for filing, exercising or substantiating an action at law.

### 14.4. Data portability

In the event that the data are processed on the basis of the customer's consent or on the basis of an agreement, the customer can ask to get his personal data back. He then has the right to pass these data on to a different processor. Orange Belgium cannot object to this.

### 14.5. Objecting to the processing of data by Orange Belgium for direct marketing purposes

As a customer, you have the right to object to the use of your data for direct marketing purposes or for profiling that serves as the basis for processing operations for direct marketing purposes. Orange Belgium may then no longer process these data.

You can do this in a number of ways:

- The customer can unsubscribe from the direct marketing campaigns or from Orange Belgium's loyalty programme via his customer zone at <https://www.orange.be/nl/e-services/login> <https://www.orange.be/fr/e-services/login> , or by calling the customer service at 5000 with your Orange Belgium mobile phone (free) or 02 745 95 00 with another line (local rate).
- The customer can add his telephone number(s) to the "do-not-call-me" list if he does not want to receive any commercial calls on his device(s). The customer can register via [www.bel-me-niet-meer.be](http://www.bel-me-niet-meer.be) or [www.ne-m-appellez-plus.be](http://www.ne-m-appellez-plus.be), or by sending a letter to Do Not Call Me vzw (DNCM) Z.1 Research Park 120, 1731 Zellik.

The customer can also object to processing of his data that is based on the legitimate interest of Orange Belgium. If Orange Belgium can demonstrate that there are compelling justified grounds that outweigh his objection or that the data are necessary for filing/exercising/substantiating a legal claim, then the data can still be processed.

If the customer's data are processed on the basis of consent, then the customer can always withdraw this consent. This is dealt with below under 'Management of the consent'. If the data are processed on the basis of a contract, then the customer can cancel this contract.

With each communication for marketing purposes the customer will have the possibility to unsubscribe from this via a function in the e-mail or by sending the word "stop" to the number from which a text message was sent.

#### 14.6. Management of the consent

As a customer of Orange Belgium, you can manage your consent yourself in the customer zone. In this way you can decide what personal data may be used for which purpose by Orange Belgium. This ensures that you can make a personalised choice about how your data are processed. These choices can always be changed.

The customer can manage these consents on the level of all of the numbers on the contract, or per each individual number.

The consents of a minor can only be managed by the owner of the contract.

#### 14.7. Requesting limited processing of data

The customer can ask to limit the processing of his data, whereby Orange Belgium may do nothing with these data other than save them. This is possible in the following cases:

- The customer disputes the correctness of his data. The data processing can be limited while Orange Belgium verifies the accuracy of the data.
- The processing is illegal and the customer opposes the erasure of the data, but requests instead that their use be restricted.
- Orange Belgium no longer requires the data, but the customer still needs the data in order to establish his rights, to exercise them or to defend them in court.
- The customer has objected to the processing, but it is still unclear whether the justified interests of Orange Belgium outweigh those of the customer.

If Orange Belgium wishes to process the data in some manner other than those mentioned in this policy, the customer must give his explicit consent for this.

#### 14.8. The Data Protection Officer

The Data Protection Officer is the confidential and independent contact point for the customer for questions, comments or complaints relating to the processing of personal data. The Data Protection Officer can rely on the support of all involved departments for the performance of his tasks.

The Data Protection Officer can be contacted via the Legal Department, Bourgetlaan 3, 1140 Brussels or via [privacy.officer@orange.be](mailto:privacy.officer@orange.be).

## 15. What processing activities are not performed?

Orange Belgium undertakes not to process your personal data for the following purposes:

- Profiling, as defined in article 4 (4) GDPR, resulting in special categories of personal data as provided in article 9 GDPR, such as religious beliefs or political opinions.
- Use of location data for following individual persons, unless this is part of a location-based service.
- Sale of personal data of individual persons to third parties, unless consent for this is requested in advance;
- Processing of the content of communications; for example, the content of text messages, telephone calls, films, etc. for marketing or profiling.

## 16. Complaints, comments or problems?

Orange Belgium does everything in its power in order to guarantee the privacy of its customers and to deal with complaints about this as well as possible. In case of questions, problems or suspicion of abuse with regard to the customer's privacy, the customer can always contact the Data Protection Officer of Orange Belgium via the following channels:

- By e-mail: [privacy.officer@orange.be](mailto:privacy.officer@orange.be)
- By post: Orange Belgium Legal Department – Bourgetlaan 3 - 1140 Brussels

In case of further problems or comments, the customer can always contact the Belgian Data Protection Authority via the following website <https://www.privacycommission.be/>. A complaint can also be submitted if the customer is not satisfied with the way in which Orange Belgium has dealt with his questions or complaint.

## 17. Glossary

Category of personal data	Description
Personal data	Any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Hereby no distinction is made between information that is publicly accessible or confidential and information that is professional or not.
Identification data	Identification data of the customer: name, address, date of birth, sex, ID card number, national register number and e-mail address (optional)
Consumption data	If you use the mobile and fixed telephony or internet services of Orange Belgium, Orange Belgium will collect consumption data for each call or each internet connection. These consumption data include: <p style="margin-left: 40px;">Addressee, device identification, date and duration of the call or date of a telephony service,</p> <p style="margin-left: 40px;">Duration, destination and consumed volume of an internet session,</p> <p style="margin-left: 40px;">Type, date and cost of paying services; for example, SMS parking ticket, SMS public transport ticket, additional TV services</p>
Financial data	The account number of the customer for activating the direct debit. The customer's payment data and, for prepaid customers, the payment or reloading history.
Contact with the customer service department	History of the customer's contacts with the customer service department or an employee in a store: date, reason and brief description of the contact. All communication that takes place with the customer service department - such as telephone calls, e-mails, social media and contact forms - is retained
Technical data	When using the services, the mobile and fixed network and the devices generate technical data: for example, the actual download speed, broken-off connections, device malfunctions, etc. All of these technical data are brought together.
Log information	An internal log book registers all activities relating to your use of the mobile application (App): connection, use and interaction data of the Application and the Services
Localisation data	Localisation data are also generated for each call or each internet connection. Localisation data indicate which transmission tower or connection point (router, WiFi point, etc.) the device is connected to.
Encryption	A method whereby data are replaced by other signs, which ensures that the information can no longer be read. This is a reversible process because the information can be returned to plain text if one has the right type of key for doing this.
Anonymised data	Data which can no longer be linked to an identified or identifiable person.
TV data	The information that is collected on the TV channels and programmes that

	the customer watches and the way in which the customer watches (direct or delayed).
Internet data	The detailed information that is collected with regard to the visited website (e.g.: www.orange.be) and application used (e.g.: WhatsApp) during a mobile or fixed internet session.
Connected objects or smart devices	Non-standard computer equipment that is produced or manufactured by hardware manufacturers, with a human-machine interface and the possibility of sending data, which establishes a wireless connection with a network, including smart devices in the house, smart portable devices, smart air purification devices, etc.

## 18. Changes to the policy

Any changes in the data protection policy of Orange Belgium are published on this website, so that the customer is kept informed.

Version 6.3 drawn up in February 2021