



PERSONAL DATA PROTECTION POLICY

Last update: 01/08/2022

Introduction

Eutelsat S.A. ("**Eutelsat**"), which markets Konnect's products and services, values the protection of privacy and personal data of the users of its website and services.

Eutelsat complies with the applicable laws and regulations to the processing of personal data, including the European General Data Protection Regulation No. 2016/679 of 27 April 2016 ("**GDPR**"), 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) and the Data Protection Acts 1988 to 2018 of Ireland, as such laws may be updated from time to time.

This policy (the "**Policy**") describes Eutelsat's commitment to protecting the personal data of the users of its website <https://europe.konnect.com> (the "**Visitors**") and users and customers of its online and offline services and products (the "**Subscribers**"; Visitors and Subscribers will also be referred to together as "**you**" "/"**your**"). It also provides information on the processes for collecting and using your personal data, as well as your rights in this respect.

This Policy may be modified at any moment by Eutelsat, in particular in order to comply with regulatory, legal, editorial and/or technical changes and to include description of any further processing activity that may be carried out in the future. Material changes will be notified via email, nevertheless we recommend that you check, on a regular basis, the latest version of the Policy, available on the Website.

The Policy complements the conditions of the [General Terms of Use of the Website](#) and the [Contractual Conditions](#) available on the Website or provided otherwise by Eutelsat when selling its products and services, in compliance with the applicable laws and regulations.

Article 1. Who is the entity taking decisions on how to process your personal data?

Eutelsat S.A. is the data controller of your personal data, 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.

Eutelsat has appointed a data protection officer ("**DPO**"), who can be contacted at the following addresses in case of enquiries on Eutelsat's processing of your personal data:

- By email : dpo@konnect.com.
- By regular by mail at Eutelsat S.A. – DPO Service konnect – 32, Boulevard Gallieni - 92130 Issy-les-Moulineaux.

Article 2. Which personal data are collected by Eutelsat?

For the provision of Eutelsat's services and products, including provision of our website <https://europe.konnect.com> (the "**Website**"), and for interacting with you (e.g. when you request information and/or assistance from us), we collect personal data about you, that may be either provided directly by you (e.g. your contact details), or collected by us (e.g. your IP address), also from public sources (such as public databases/registers).



Eutelsat principally processes the following personal data, for the purposes detailed 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 public IP address. This IP address will be collected and stored for the same period as cookies (see our [cookie policy](#)) and will not be used to track your activity on our website. It will only be used for the administration of services offered on the Website;
- Information relating to our services and products that you have purchased, such as user statistics, subscriptions, consumption, type of use, after-sales and helpdesk requests (including via phone);
- Recordings of telephone calls made to the phone numbers indicated on the Website when necessary to collect proof of execution of a purchasing agreement;
- Data collected using cookies, such as browsing history, login logs, data relating to the installation of software programmes and apps for the provision of Services (such data will be processed also according to our [cookie policy](#));
- Data relating to possible complaints and disputes.

When personal data is collected, we will inform whether it is necessary or not for the provisions of the specific service and/or product concerned. In case necessary personal data is not provided, we will not be able to fulfil your requests.

We may combine the information provided by you to us through different channels (e.g. emails, what's app, sales, surveys and competitions etc.) with personal data collected from your navigation.

Please do not communicate to us personal data that are not required and needed for the provision of the specific service purchased and/or to reply to the question raised: in particular, do not provide us with special categories of personal data (e.g. health data, data related to political opinions and to trade-union memberships and sexual preferences), since we do not need them for the purposes for which we process your personal data.

Article 3. Why does Eutelsat collect my personal data?

Due to its accountability for data processing, Eutelsat collects and processes your personal data for clearly defined and legitimate purposes and it is committed to collect only the personal data that are strictly necessary to pursue each specific purpose for processing.

Eutelsat processes your Data primarily to provide you with the Website and its (online and offline) products and services; it may also process your Data for marketing purposes and for its legitimate interest (to protect its rights also through judicial means, as well as to do business and increase its revenues).

The table below explains the various purposes for processing your personal data and the legal basis applicable to each one.

Purpose	Legal basis
Managing requests about services and products (pre- and post-sale) and provision of (pre- and post-sale) assistance (including via phone and similar tools, like Whatsapp and Messenger).	Eutelsat's legitimate interest to ensure appropriate follow up of requests, which is not overridden by your interests or fundamental rights and freedoms.
Provision of services, delivery and installation of equipment for the provision of services.	Fulfilment of contractual obligations.
Subscriber identification and login for the provision of services and products.	Fulfilment of contractual obligations.
Invoicing and collection of payments.	Fulfilment of contractual obligations.
Payment recovery proceedings.	Fulfilment of contractual obligations.
Managing complaints and disputes.	Eutelsat's legitimate interest to ensure appropriate follow up of complaints and disputes, which is not overridden by your interests or fundamental rights and freedoms.
Compiling statistical, use and consumption data.	Eutelsat's legitimate interest to monitor its activities, which is not overridden by your interests or fundamental rights and freedoms.
Managing deployment, security and maintenance operations for the Website and services.	Eutelsat's legitimate interest to ensure the security of the Website, which is not overridden by your interests or fundamental rights and freedoms.
Fraud prevention.	Eutelsat's legitimate interest to combat fraud, which is not overridden by your interests or fundamental rights and freedoms.
Improving packages, customer relations and support.	Eutelsat's legitimate interest to ensure customer satisfaction, which is not overridden by your interests or fundamental rights and freedoms.
Service communications (via email, post, phone and similar tools, like WhatsApp and Messenger).	Eutelsat's legitimate interest for those communications sent by email and concerning the same services and products already purchased by a Subscriber, and for communications by post and phone.
Profiling and profiled marketing communications (via email, post, phone and similar tools, like WhatsApp and Messenger),	Your consent for electronic communications. Eutelsat's legitimate interest to promote its activities, for those marketing communications sent by email and concerning the same services and products already purchased by an existing Subscriber.
Sales, surveys, competitions, promotional prize contests, rewards, and loyalty programs.	Your consent.
Storing of data required for the provision of the Services	Fulfilment of contractual obligations.
Response to the request for communication of data by official authorities and bodies.	Eutelsat's legal obligations.
Response to judicial or official requests and interdiction procedures.	Eutelsat's legal obligations.



Article 4. Who will my personal data be shared with?

We share your data when necessary to manage the website and our services.

As part of using the website or our services, certain information about you is communicated third-party suppliers and service providers involved in providing the Website and the services, including the management and performance of the contract that you may have executed with us (also by purchasing our services and products). Information is only shared to the extent needed for the provision of the service. In this way, your payment data is sent to our payment providers and banking institutions to carry out transactions related to your subscriptions.

Some of these services may also be carried out by other companies belonging to Eutelsat's group.

Unless otherwise provided in specific/further information notices, said entities will act as data processors and, as such, process your personal data according to Eutelsat's instructions as issued pursuant to the data processing agreements executed in compliance with the applicable laws.

With your permission, certain data (contact details, profile) is shared with partners to send you personalised offers.

Certain data (full identity, contact details, invoice, debts, claims) is also shared with our debt recovery agency, our legal firms, or legally authorised third parties to allow us to recover our debts, manage disputes and prevent unpaid sums and claims.

Your data may also be shared in cases not described above when required by law. Certain information about you may thus be communicated to the competent authorities, administrations or organisms in the context of legal or regulatory procedures, requisitions or decisions and communications requests.

Unless otherwise provided, said entities will act as independent data controllers.

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 necessary for said pre-litigation or litigation purposes.

Article 6. Where will my personal data be processed?

The personal data collected are mainly processed by Eutelsat and its third-party suppliers within the European Union.

For certain specific operations and with your prior explicit consent or on other appropriate legal basis, personal data may be processed outside the European Union.

As a global company, Eutelsat may transfer certain personal data to the personnel of the sales and marketing departments (identity, sales data, profile), customer services personnel (to reply to specific requests) and personnel of the IT department (to the extent necessary to provide the service) employed by other entities of the Eutelsat group located outside the European Union (including China, Mexico, Jordania), as well as to Eutelsat's service providers (such as, by way of example, Salesforce Pardot) hosting its customer data base in the United Sates, and to Eutelsat business partners (such as resellers) that may be located outside of the European Union. These transfers are made under the standard contractual clauses adopted by the European Commission.

This may also happen in case you choose to contact us via Messenger and/or WhatsApp: these services are provided by an external provider (Facebook), which may process your personal data also outside of the European Union. Please note that the use of Messenger and/or WhatsApp to contact us is voluntary and based on your free choice: you are not bound to use such tools (you can contact us using other channels, as described on our Website and in our contractual documents) but, if you decide to use said tools, please be informed that your personal data may be transferred outside of the European Union, including to countries that may not ensure to your personal data the same level of protection provided within the European Union.

In all other cases when the personal data are transferred to entities established outside the European Union and, in particular, towards countries which do not benefit from an adequacy decision of the European Commission, the transfer will be subject to the adoption of - at least - one of the guarantees provided for by the legislation on the protection of personal data, such as – by way of example only - standard contractual clauses adopted by the European Commission.

The transfer will in any case be made upon provision of appropriate information on the features of processing and through the implementation of appropriate technical, organizational and/or contractual security measures, suitable to ensure that the personal data are afforded, in the non-European country of destination, a level of protection essentially equivalent to the one provided within the European Union. You will be entitled at any time to obtain a copy of the personal data transferred outside the European Union and to receive information about the countries in which the data are stored and processed, and the level of protection and the guarantees put in place to ensure adequate protection, and, where the transfer is based on the standard contractual clauses adopted by the European Commission, to obtain a copy of these clauses, by making a request to be submitted to the contacts referred to under Article 8 below.

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 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 a level of security appropriate to the risk. Furthermore, the personnel employed by Eutelsat and such third-party suppliers will comply with specific instructions on processing and are subject to strict confidentiality obligations.



Eutelsat cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data but we take reasonable steps to prevent this from happening. We have put in place measures to protect the security of your personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

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

Subject to certain conditions pursuant to the applicable laws, you are entitled to exercise the following rights, at any time, 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 and receive a copy of the personal data that we hold about you;
- The right to request the correction of incorrect or incomplete personal data in order to ensure that data we hold about you is accurate;
- The right to request the deletion of your personal data;
- The right to request the restriction of the processing of your personal data;
- The right to object to the processing of your personal data for legitimate reasons;
- The right to request the portability of your personal data;
- The right not to be subject to a solely automated decision except as provided for in this policy; and
- Regarding processing requiring consent, you have the right to withdraw your consent at any moment. This withdrawal will not affect the lawfulness of processing that took place based on consent before your consent was withdrawn.

In order to exercise some of these rights we may need to request specific information from you to help us confirm your identity and ensure your right to access the personal data, or to exercise any of your other rights. We may ask you to provide us with your current name and address, proof of identity (a copy of your driving licence, passport or two different utility bills that display your name and address), and once verified we will delete this data. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Please direct any questions regarding the exercise of the above rights: by post, to the following address: Eutelsat S.A. – DPO Service konnect – 32, Boulevard Gallieni - 92130 Issy-les-Moulineaux; or by email, to the following address: dpo@konnect.com.

You have the right to lodge a complaint with the French national Data Commission (Commission Nationale de l'Informatique et des Libertés française - CNIL): <http://www.cnil.fr> or the Irish Data Protection Commission (Ao Coimisiún um Chosaint Sonrai – DPC): <https://www.dataprotection.ie/>). You can also start proceedings before a Court of competent jurisdiction.

Furthermore, you 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.dataprotection.ie/en/organisations/rules-electronic-and-direct-marketing/ndd-faqs>.