

# MyProximus Privacy Notice

## 1. Introduction

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

As part of this commitment, Proximus wishes to explain, through this Privacy Notice, how and why we process your personal data when using the MyProximus application, with whom your data will be shared as well as what your rights are in this respect.

This Privacy Notice also informs you who you can contact within Proximus in case of questions or in case you wish to exercise your rights.

## 2. Who is the controller?

Proximus, with its registered office at 27 Bd. Du Roi Albert II, B-1030 Brussels and registered at the ECB under number 0202.239.951 is responsible for the collection and processing of your personal data in the MyProximus application, both via the web as via the app (“MyProximus”) in its capacity as controller.

MyProximus enables you to have a clear and concise overview of your customer account, your products and services and related bills, to participate to the Enjoy! Program and to access other applications (e.g., EnergyID). Some of the services available in MyProximus under the subsection ‘Services’ link to the application of a partner (e.g., Family life, Banx, Doktr). Once personal data is transferred to one of these partners, the processing of that personal data falls under the partner’s responsibility, in his capacity as a separate controller. To obtain more information on the processing of personal data by a specific partner, we invite you to read the privacy notice of that partner. A link to the respective privacy policies can be found in the section [‘For what purposes do we use your personal data?’](#) of this Privacy Notice.

## 3. What is in scope of this Privacy Notice?

This Privacy Notice is applicable to every processing of personal data of MyProximus users.

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

Your personal data is collected and processed for the purposes listed in this section. For each purpose, you will find an overview of the personal data collected and processed, the lawful basis for this processing activity, the retention period of the personal data and the partners with whom personal data is shared.

### The creation of a MyProximus account

#### What personal data will Proximus use?

For the purpose of creating a MyProximus account, you will be requested to disclose us the following information:

- Title (Mr, Mrs, Ms)

- First name, last name
- Postal code
- Date of birth
- Email address
- Mobile phone number
- Customer number
- Preferred language

Upon creation of your account, Proximus will link a technical identifier to uniquely identify your MyProximus account.

#### **What justifies this processing activity?**

The processing of some of your personal data (first name, last name, postal code, date of birth, email address, mobile phone number and customer number) for this purpose is necessary for the performance of the contract in the context of the creation of a user account, to uniquely identify you when creating a MyProximus account and to enable you to log in to and use your MyProximus account.

Proximus processes your title and your preferred language based on a legitimate interest to address you in a correct manner and to display the information in a correct language.

#### **How long will Proximus keep these data in MyProximus?**

Your personal data will be processed until you chose to delete your MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

#### **With whom does Proximus share these data?**

The personal data you share with us when creating your MyProximus account will, at that moment, not be shared with any third parties.

However, when you use a third-party service in MyProximus, it is possible that some of your personal data are shared with this third party. We invite you to read the specific sections of third-party service provider in MyProximus in this Privacy Notice for further information on the eventual sharing of data with that third-party service provider and, if any, which types of personal data are shared.

### **Logging in to your MyProximus account with itsme**

#### **What personal data will Proximus use?**

After creation of a MyProximus account, there are two ways to log in to your account.

You can either choose to log in by using your email address and your password or you can choose to log in via itsme.

If you choose to log in via itsme, your mobile phone number is shared with itsme. Your mobile phone number and a technical identifier are shared by itsme.

#### **What justifies this processing activity?**

You consent to the processing of your personal data to log in to your MyProximus account via itsme by clicking on 'confirm'.

#### **How long will Proximus keep these data in MyProximus?**

Your personal data will be processed until you chose to delete your MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

#### **With whom does Proximus share these data?**

Your mobile phone number will be shared with Belgian Mobile ID S.A., the company owning itsme. More information on the processing of your personal data in itsme can be found in their [privacy notice](#).

### **My Proximus Family**

#### **What personal data will Proximus use?**

An administrator of a customer account can invite family members (maximum 7) to join his My Proximus Family in MyProximus. In doing so, the separate MyProximus-accounts of family members become interlinked and are recognized as being part of the customer account of the administrator. This allows the different members to benefit from the additional services linked to the customer account (e.g. every member of a MyProximus family will be able to log into Pickx with their own MyProximus credentials, instead of all using the credentials of the account administrator).

Proximus will not collect or process more data in the context of My Proximus Family. Proximus will only learn to know the link between owners of separate MyProximus' accounts as being part of one My Proximus Family.

#### **What justifies this processing activity?**

Proximus has a legitimate interest to process these data to give you and your family members the best user experience for your products and services at Proximus.

#### **How long will Proximus keep these data in MyProximus?**

Your personal data will be processed in MyProximus until you chose to delete your MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

#### **With whom does Proximus share these data?**

The personal data you share with us when creating your MyProximus account and when becoming part of a My Proximus Family will not be shared with any third parties at that moment.

However, when you use a third-party service in MyProximus, it is possible that some of your personal data are shared with this third party. We invite you to read the [specific](#)

[sections](#) of third-party service provider in MyProximus in this Privacy Notice for further information on the eventual sharing of data with that third-party service provider and, if any, which types of personal data are shared.

## My account

### What personal data will Proximus use?

- Title (Mr, Mrs, Ms)
- First name, last name
- Function within MyProximus (e.g., administrator)
- Avatar (if any)
- Mobile phone number
- Customer number
- Email/login
- Date of birth
- Language
- Legal address
- Installation address
- Billing address
- Unique identifiers of Proximus equipment (router, WiFi booster, digibox,...)
- Mobile phone number for itsme activation
- Technical identifier

### What justifies this processing activity?

The processing of your personal data is necessary for the performance of Proximus' contractual obligations in the context of MyProximus and to offer you a core functionality of MyProximus, namely, to display your customer details and details of your products and services in a transparent way. Typically, this is the type of information a MyProximus user is looking for when creating a MyProximus account.

Some personal data elements are processed based on the legitimate interest of Proximus to make the MyProximus account personalized for you as a customer and to make sure you are addressed in the correct way and language.

### How long will Proximus keep these data in MyProximus?

Your personal data will be processed in MyProximus until you chose to delete your MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

### With whom does Proximus share these data?

Within the context of MyProximus, your personal data is not shared with third parties.

## Overview of your Proximus products and services

### What personal data will Proximus use?

For the purpose of displaying the products and services linked to your customer account, the following personal data are processed:

- First name, last name
- (Mobile) phone number
- Email address
- Legal address
- Installation address
- Billing address
- Customer number
- Gender
- Language
- Unique identifiers of Proximus equipment (router, WiFi booster, digibox,...)
- Consumption details (used GB, international calls, Pickx app usage,...)

#### **What justifies this processing activity?**

The processing of your personal data is necessary for the performance of Proximus' contractual obligations in the context of MyProximus and to offer you a core functionality of MyProximus, namely, to display your products and services in a transparent overview.

Proximus has a legal obligation to provide free access to timely information on the level of consumption of the services included in the tariff plan.

Some personal data elements are processed based on the legitimate interest of Proximus to make the MyProximus account personalized for you as a customer and to make sure you are addressed in the correct way and language.

#### **How long will Proximus keep these data in MyProximus?**

Your personal data will be processed in MyProximus until you chose to delete your MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

#### **With whom does Proximus share these data?**

Within the context of MyProximus, your personal data is not shared with third parties.

## **Overview and evolution of your bills**

#### **What personal data will Proximus use?**

For the purpose of displaying your bills and the evolution in the latest bills, MyProximus collects and processes the following personal data:

- First name, last name
- Customer number
- Bill number
- Billing address
- Installation address
- Subscription type

- (Mobile) phone number
- General consumption overview
- Consumption details (if activated) of calls, SMSs, tv and internet traffic
- Amount due
- Unique identifiers of Proximus equipment (router, WiFi booster, digibox,...)
- Easy Switch code
- Overview of amounts of latest bills

#### **What justifies this processing activity?**

The processing of your personal data is necessary for the performance of the contractual obligations of Proximus in the context of MyProximus and to offer you one of the core functionalities of MyProximus, namely, to provide access to a transparent overview of your monthly bills and the evolution of your bills.

Some personal data elements are processed based on the legitimate interest of Proximus to make the MyProximus account personalized for you as a customer and to make sure you are addressed in the correct way and language.

Proximus has a legal obligation to provide for an Easy Switch Code for every customer and to mention this Easy Switch Code in the monthly statement. Proximus relies on its legitimate interest to process this code in MyProximus as well, to fully be transparent about your Easy Switch Code where you would expect it to be found.

#### **How long will Proximus keep these data in MyProximus?**

These data will be processed by Proximus up until the moment of deletion of the MyProximus account. After a period of inactivity of 18 months, your MyProximus-account will automatically be deactivated and all related data in MyProximus will be deleted.

#### **With whom does Proximus share these data?**

Within the context of MyProximus, your billing data is not shared with any third party.

Enjoy!

#### **What personal data will Proximus use?**

Enjoy! is a loyalty program administrated by Proximus and accessible via MyProximus. When you access the Enjoy! Program, you become a member of the program and you can enjoy (personalized) advantages (e.g. contests, deals, gifts,...). Proximus processes personal data for the purpose of Enjoy! to check if you are a Proximus customer, to check if your eligible to participate in the program (the program is only accessible for Belgian citizens that are minimum 18 years old) or to contact correctly you after a contest (e.g. when you won a contest):

- Title (Mr, Mrs, Ms)
- First name, last name
- Postal code
- Date of birth
- Email address

- Mobile phone number
- Customer number
- Preferred language

On the basis of your activity on the Enjoy! page, Proximus will identify your interests and add these preferences to your existing customer profile. This information is used to inform you on contests or deals that are relevant for you and to offer you personalised surprises. This information might furthermore also be used to personalise other marketing campaigns about Proximus products and services.

#### **What justifies this processing activity?**

When you want to participate in the Enjoy! program, you consent to the General Terms & Conditions of this program, as well as to the processing of your personal data.

Proximus has a legitimate interest to process your personal data for direct marketing purposes.

You can object, at any time, against the collection of personal data to identify your interests and against the fact that your preferences are added to your existing customer profile. This objection will not prevent you from benefitting from the Enjoy! contests and deals.

#### **How long will Proximus keep these data in MyProximus?**

Your personal data will be processed by Proximus up until the moment you are no longer a member of Enjoy!.

#### **With whom does Proximus share these data?**

Your contact information might be shared with Enjoy! partners Hilarious and T-Tech to deliver the reward or to follow-up on a prize you won.

The preferences that are generated on the basis of your use of the Enjoy! Program and that are added to your customer profile, are not shared with third parties.

### **Pay&Go reload online**

#### **What personal data will Proximus use?**

- Mobile phone number
- Personalised text (in case you offer a Pay&Go reload online to someone else)

#### **What justifies this processing activity?**

The processing of your personal data for this purpose is necessary for the performance of the contract.

#### **How long will Proximus keep these data in MyProximus?**

Proximus will not keep any data related to Pay&Go reload online in MyProximus.

#### **With whom does Proximus share these data?**

Your personal data in this section will not be shared with third parties.

## Shop appointment

### What personal data will Proximus use?

- First name, last name
- Email address
- (Mobile) phone number
- Details on the reason of the appointment
- Location data (if consented to by the user)

### What justifies this processing activity?

Proximus has a legitimate interest to process these data in the context of a shop appointment, since it gives the shop an insight on who to expect at what time and for what reason (incident, new product or service, etc.). Your contact details will be used to get in touch with you regarding your shop appointment.

When you want to know what the nearest shop is to make an appointment, your location data will be processed if you consented to this in your (mobile) device settings.

### How long will Proximus keep these data?

Proximus will not keep any data related to shop appointments in MyProximus.

### With whom does Proximus share these data?

These data are shared with the Proximus shop for which you made the appointment. Your personal data are not shared with third parties.

## Direct marketing

### What personal data will Proximus use?

Proximus has a legitimate (commercial) interest in processing and using your data to promote and better align its offers, products and services with you potential interests. Therefore, Proximus will process some of the data you filled out upon creation of your MyProximus account for this direct marketing purpose.

### What justifies this processing activity?

Proximus has a legitimate interest in processing your personal data for this purpose.

### How long will Proximus keep these data?

The data from MyProximus will be processed by Proximus for this purpose up until the moment of deletion of the MyProximus account. After a period of inactivity of 18 months, your MyProximus account will automatically be deactivated and all related data in MyProximus will be deleted.

### With whom does Proximus share these data?

Your personal data can be shared with partners assisting us with our marketing activities, e.g. partners that enable us to send out mass marketing emails or postal mail.

### **My e-Press**

A link to the digital newspaper of your choice (Le Soir or HLN) is displayed in MyProximus. When clicking this link, you are redirected to a dedicated webpage of the newspaper you selected. On that webpage, you are asked to log in with your MyProximus credentials. As a second step, you are asked to:

- Either log in to your existing newspaper account;
- Or invited to create a new account.

You can access the privacy notice of the newspapers by clicking on the links below:

- [Le Soir](#)
- HLN: [here](#) (NL) and [here](#) (FR)

### **Family life**

A link to the 'Family life' application is displayed in MyProximus. When clicking this link, you are:

- Either redirected to the App Store/Android Store to download the app. Upon registration for the app, you are asked to log in with your MyProximus credentials or to create a separate login;
- Or redirected to the 'Family life' application if you already downloaded and registered to the application.

You can access the privacy notice for the 'Family life' application (Settings – About – Terms of Service).

### **EnergieID**

A link to the 'EnergieID' application is displayed in MyProximus. If you consent to it, Proximus will share your first name, last name and email address with EnergieID. These data are shared with and processed by EnergieID to create an account.

EnergieID will collect and process personal data related to your house or apartment on their own behalf. More information on the processing of your personal data can be found in their privacy notice [here](#) (NL) and [here](#) (FR).

### **Doktr**

A link to the 'Doktr' application is displayed in MyProximus. When clicking this link, you are:

- Either redirected to the App Store / Android Store to download the app. Upon registration for the app, you are asked to log in with itsme;
- Or redirected to the 'Doktr' application if you already downloaded and registered to the application.

You can access the privacy notice for the 'Doktr' application [here](#) (NL) and [here](#) (FR).

### **Banx**

A link to the 'Banx' application is displayed in MyProximus. When clicking this link, you are:

- Either redirected to the App Store / Android Store to download the app. Upon registration for the app, you are asked to log in with your debit card;

- Or redirected to the 'Banx' application if you already downloaded and registered to the application.

You can access the privacy notice for the 'Banx' application [here](#) (NL) and [here](#) (FR).

### **Pickx**

A link to the 'Pickx' application is displayed in MyProximus. When clicking this link, you are:

- Either redirected to the App Store / Android Store to download the app. Upon registration for the app, you are asked to log in with your MyProximus credentials ;
- Or redirected to the 'Pickx' application if you already downloaded and are already registered to the application. You are asked to log in with your MyProximus credentials.

### **4411**

A link to 4411 is displayed in MyProximus. When clicking this link, you are redirected to the login page of 4411, which asks you to login with your mobile phone number and your specific 4411 password.

You can access the privacy notice for 4411 [here](#).

## **5. What are my privacy rights and how can I exercise them?**

### **Right of access**

You have the right to request access to your personal data. In case you want to exercise this right, Proximus will provide you with an overview of the personal data that is processed about you, including the data processed in MyProximus. You will also receive additional information on, for example, the reason why these personal data is processed, the origin of the data, the types of third parties with whom we share your personal data, etc.

You can exercise your right to access by:

- Using this [webform](#).
- Sending an email to: [privacy@proximus.com](mailto:privacy@proximus.com); or
- Sending a letter to: Proximus Data Protection Office – Boulevard du Roi Albert II, 27, 1030 Brussels.

### **Right to rectification**

You can have your personal data corrected in case you notice that certain data that Proximus holds about you in MyProximus are not or no longer correct.

You can correct certain data yourself via MyProximus Web (My account – Edit profile – Personal information) or MyProximus App (My account – Edit profile – Personal information). You can also call the Proximus customer service on 0800 55 800 or by use this [webform](#) to request a rectification.

### **Right to erasure**

If you wish, you can delete your MyProximus account yourself. You can do this via MyProximus Web (My account – Account details – Delete my account) or via MyProximus App (My account – Edit profile – Personal information).

If you are unable to delete your MyProximus account yourself, you can contact the Proximus Customer Service Department on 0800 55 800.

### **Right to object**

On the basis of your activity on the Enjoy! page, Proximus will identify your interests and add these preferences to your existing customer profile. This information is used to inform you on contests or deals that are relevant for you and to offer you personalised surprises. This information might furthermore also be used to personalise other marketing campaigns about Proximus products and services.

You can object, at any time, against the collection of personal data to identify your interests and against the fact that your preferences are added to your existing customer profile via:

- MyProximus Web (My Account – Alerts and Privacy - Communications);
- MyProximus App (My Account – Alerts and Privacy - Communications).

This objection will not prevent you from benefitting from the Enjoy! contests and deals.

### **6. Changes in the Privacy Notice**

This Privacy Notice may be expanded or adapted in the future. For this reason, we recommend that you consult the Privacy Notice regularly.

### **7. Contact details of the Data Protection Officer**

If you have any questions about this Privacy Notice or about the processing of your personal data in MyProximus, please contact the Data Protection Officer:

- Via email: [privacy@proximus.com](mailto:privacy@proximus.com)
- Via postal mail: Proximus Data Protection Office – Boulevard du Roi Albert II, 27 – 1030 Brussels

### **8. Lodge a complaint with the Belgian Data Protection Authority**

If you are not satisfied with the answer you receive from Proximus, or you do not agree with Proximus' point of view, you can contact the Data Protection Authority and submit a complaint. More information can be found [here](#).