

Pickx Privacy Notice

1. Introduction

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

As part of this commitment, Proximus wishes to explain, through this Privacy Notice, how and why it processes your personal data when you are using Pickx, 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 Pickx, both via a TV box and via Pickx App and Pickx Web (“**Pickx**”) in its capacity as controller.

Pickx enables you to watch and listen to audio, visual, and audiovisual works and to use interactive applications (e.g., Video on Demand (“**VOD**”), interactive games, contests, or specific subscriptions to additional services).

Some of the services available in Pickx link to the service of a partner (e.g., Netflix or Disney+). 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 4 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 Pickx users. When referring to “**Pickx**”, both Pickx via a TV box as Pickx App and Pickx Web are in scope.

Some processing activities, however, are specific for Pickx via the TV box or for Pickx App and Pickx Web. When this is the case, this is indicated in the title of the subsections under section 4 below.

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.

Access to Pickx App or Pickx Web

What personal data will Proximus use?

- **Collected data:** Identity and contact information, Personal characteristics.
- **Observed or generated data:** Internal identifiers, Technical identifiers, Hardware information, Product and service subscription information.

What justifies this processing activity?

This processing is necessary for the performance of the contract to which you are a party (art. 6(1)(b) GDPR).

How long will Proximus process these data?

The personal data needed to identify and authenticate a customer or end-user to access Pickx App or Pickx Web will be processed for 1 year after the creation of the device identification data set.

This means that in case of inactivity on Pickx App or Pickx Web for 1 year, you will be requested to identify your device again before getting access to the TV-services via your device.

With whom does Proximus share these data?

This data is not shared with any third parties.

If you want to use Pickx App or Pickx Web, you first need a MyProximus-account. If you would like more detailed information about the processing of personal data for the purpose of the creation of a MyProximus-account, we refer to the [Privacy Notice for MyProximus](#).

In case you want to start consuming TV-services via a device other than your TV box, it is required to register the device (e.g., smartphone, tablet, PC, Apple TV) that is trying to consume the TV-services. This device identification data set is used to determine the services that this device can consume (e.g., correct streaming platforms and content available on the device based on the content rights).

In this context, Proximus processes data linked to you and linked to the device you are using, to enable your access to Pickx App or Pickx Web via your device, as part of Proximus' contractual obligation to provide you with the services you contracted to.

Access to Pickx via your TV box

What personal data will Proximus use?

- **Observed or generated data:** Internal identifiers, Technical identifiers, Hardware information, Product and service subscription information.

What justifies this processing activity?

This processing is necessary for the performance of the contract to which you are a party (art. 6(1)(b) GDPR).

How long will Proximus process these data?

The personal data needed to identify and authenticate a customer or end-user to access Pickx via your TV box will be processed for 1 year after the creation of the device identification data set.

This means that in case of inactivity on Pickx via your TV box for 1 year, you will be requested to identify your device again before getting access to the TV-services via your TV box.

With whom does Proximus share these data?

This data is not shared with any third parties.

In case you want to start consuming TV-services via your TV box, it is required to register the TV box that is trying to consume the TV-services. This device identification data set is used to determine the services which the device can consume (e.g., correct streaming platforms, content available on the TV box based on the content rights and technical capabilities of the TV platform).

In this context, Proximus processes data linked to you and linked to your TV box to enable your access to Pickx via your TV box, as part of Proximus' contractual obligation to provide you with the services you contracted to.

Use of the TV-service (including recordings, delayed viewing, and VOD)

What personal data will Proximus use?

- **Collected data:** Identification and contact information, Personal characteristics, IT and telecom product and service subscription information.
- **Observed or generated data:** Internal identifiers, Technical identifiers, Product and service usage information, Product and service subscription information, Hardware information, Consumption habits, TV viewing data.

What justifies this processing activity?

This processing is necessary for the performance of the contract to which you are a party (art. 6(1)(b) GDPR).

How long will Proximus process these data?

The personal data needed for the purpose of subscriber provisioning, a process to determine to which TV-services you subscribed, will be consolidated in an audit viewing report log that will be kept for 7 days after the log has been generated.

The personal data needed for and generated in the context of content delivery (e.g., classic VOD sources, own production, content from local and international broadcasters, streaming platforms (e.g., Netflix, Disney+), online video platforms (e.g., Youtube) and digital content (e.g., news, articles, blogs) will be kept for maximum 24 hours after you have been deactivated as a subscriber of the TV-service.

With whom does Proximus share these data?

This data is not shared with any third parties.

When you successfully access Pickx via your TV box or Pickx App or Pickx Web on another device (e.g., smartphone, tablet, PC, Apple TV), Proximus will process personal data about you to provide you with the TV-services you subscribed to.

Moreover, Proximus will process and keep some personal data that is generated in the context of the use of the TV-service, amongst others to provide you a personalized user interface to propose relevant content for you as customer or end-user (see section 'Promotion of products and services on Pickx') and for internal and external reporting (see sections 'Internal reporting' and 'External reporting').

Subscription to streaming channel (Netflix or Disney+) via Proximus

What personal data will Proximus use?

- **Collected data:** Identification and contact information, Personal characteristics, Financial data, Customer interactions.
- **Observed or generated data:** Internal identifiers, Technical identifiers.

What justifies this processing activity?

The necessity of the processing in order to take steps at the request of the data subject prior to entering into a contract and the necessity of the processing for the performance of the contract (art. 6(1)(b) GDPR).

How long will Proximus process these data?

10 years after the end of the contractual relationship with Proximus (as foreseen in art. 2262bis of the old Belgian Civil Code).

With whom does Proximus share these data?

Your data will be shared with the streaming partner to which you subscribed via Proximus, i.e. Netflix and/or Disney+.

You can subscribe to Netflix or Disney+ and enjoy their streaming services via Proximus. Pickx provides technically simplified access to the streaming platform. Your subscription will be paid via your Proximus bill.

To allow you to use Netflix or Disney+, you also need to create and activate an account on the respective streaming platform. Next to the collection of personal data from you directly by the streaming platform, Proximus will also share some personal data with the streaming platform. This will allow the streaming platform to uniquely identify you and enables the platform to check if you're entitled to use its services and to manage the payment of the subscription with Proximus. The streaming platforms are independent data controllers of personal data they collect from you as a subscriber.

More information on how to activate your account on the streaming platform, can be found [here](#) (for Netflix) and [here](#) (for Disney+). The Privacy Notices of the streaming platforms, can be consulted [here](#) (for Netflix) and [here](#) (for Disney+).

Testing new functionalities for Pickx

What personal data will Proximus use?

- **Obtained data:** Identification and contact information, Personal characteristics, Profession, education and training information, Family and household composition, Product and service usage information.

What justifies this processing activity?

Your consent (art. 6(1)(a) GDPR) to be contacted to test new functionalities and improve the Pickx user experience.

How long will Proximus process these data?

Your personal data will be processed until the results of the testing cycle have been processed. Your personal data will be deleted afterwards.

With whom does Proximus share these data?

Proximus relies on Tendens to recruit participants and to schedule user interviews for a test.

How can I withdraw my consent?

You can withdraw your consent, at any time, by contacting privacy@proximus.com.

For more information on alternative ways to exercise your rights, you can consult section 5 below.

Proximus wants to continuously improve and upgrade the Pickx product with new functionalities. To do this properly, we need feedback from customers and end users.

When you participate in a testing cycle for Pickx, Proximus and its partner Tendens will collect and process personal data from you based on your consent. This personal data will be used to invite you to the testing cycle and to process your feedback. You can, as a participant, withdraw this consent at any time.

Internal reporting

What personal data will Proximus use?

- **Observed or generated data:** Internal identifiers, Technical identifiers, Product and service usage information, Hardware information.

What justifies this processing activity?

Our legitimate interest (art. 6(1)(f) GDPR) to use the data collected from Pickx via your TV box on aggregated level for internal reporting purposes, to allow us to optimize our offers, packs and our programming and to improve the Pickx services offered and our legitimate interest (art. 6(1)(f) GDPR) to do technical and system related checks on the performance of the TV-service.

How long will Proximus process these data?

The data used to generate the anonymised reports used for internal reporting are processed for 1 year from the moment of the collection of this data.

As the data in the internal reports have been anonymized, they are out of scope of the GDPR and the obligation to have a determined retention period does not apply.

With whom does Proximus share these data?

Internal, aggregated reports can be shared with Proximus Media House ('PMH'). Proximus will not share individual personal data with PMH but will only disclose trends and reports based on aggregated data collected from the use of the TV box.

Proximus generates internal reports for purposes of analysis and statistics. These reports use internal identifiers (e.g., user ID), technical identifiers (e.g., the ID of a TV box), information about the use of the TV-product and hardware information as input data to allow Proximus to have an overview on the use of the TV-service, the viewing behaviour of customers, but also to do technical and system related checks on the TV-service performance.

Although the input data to build reports are personal data at the basis, the reports itself are anonymized and will no longer contain personal data but general tendencies, volumes and numbers in case the data is used for internal reporting to optimize our offers, packs and our programming and to improve the Pickx services offered. More detailed reports, which will allow for (re-)identification of (a) customer(s), can be used to do technical and system related checks on the TV-service performance (e.g., analysis of specific error notifications in relation to a group of end users using the same Proximus device(s)).

Reports built for internal reporting purposes can be shared with PMH. PMH uses the information to gain insight into the viewing behaviour of customers and end users and to further optimize TV offerings based on this insight. Being only a receiver of an anonymized reports, PMH is not able to re-identify the individual viewers based on the reports received.

External reporting

What personal data will Proximus use?

- **Collected data:** Personal characteristics, Family and household composition.
- **Observed or generated data:** Internal identifiers, Technical identifiers, Product and service usage information, Hardware information.

What justifies this processing activity?

The processing of personal data to generate anonymized reports for broadcasters: our legitimate interest (art. 6(1)(f) GDPR).

The processing of personal data for the quarterly and yearly anonymized reporting towards the Flemish Regulator for the Media ('FRM'): our legal obligation (art. 6(1)(c) GDPR) (art. 166/1, §2 and 218 of the Flemish Decree on radio broadcasting and television d.d. 27/03/2009).

The processing of personal data to deliver pseudonymised information to Center for Information about the Media ('CIM'): compatible further processing for statistical

purposes. In this context, only the personal data of customers and end users who consented to targeted advertising via TV channels, are processed for external reporting to CIM.

How long will Proximus process this data?

The data used to generate the anonymised reports for broadcasters are processed for maximum 2 weeks from the moment the data is generated. The usage data used to generate the anonymised reports for the FRM are processed for 5 years from the moment they are generated by your use of the TV service. Usage data specifically related to your use of video on demand ('**VOD data**') are processed for 7 years from the moment a video has been ordered. Usage data specifically related to your use of the network personal video recorder ('**nPVR data**') integrated in your TV box are processed for 26 months from the moment of the recording.

As the data in the reports to the broadcasters and the FRM have been anonymized, they are out of scope of the GDPR and the obligation to have a determined retention period does not apply.

The data collected to provide in a pseudonymous way to CIM are processed for 4 months from the date the data is collected.

With whom does Proximus share these data?

External reports are built to share with broadcasters, the FRM and the CIM.

Proximus will not share individual personal data with broadcasters and the FRM but will only share anonymised information based on the viewing behaviour and the use of the TV box.

Proximus will not share individual personal data with the CIM but will only share pseudonymised information that will not allow the external parties to (re)identify the data subjects.

For external reporting purposes, Proximus generates reports for broadcasters, the FRM and the CIM. These reports process personal data as input data to allow Proximus to deliver anonymised performance insights on content usage behaviour.

Reports generated for external reporting purposes towards broadcasters (VRT, RTL, RTBF, DPG Media & SBS) will be used by these recipients to gain insight into the content usage behaviour.

Reports generated for external reporting purposes towards the FRM will be used by this recipient to calculate the subsidised amount paid by the Flemish Region to Proximus and to map the concentrations in the Flemish media sector.

Although the input data to build reports for reporting towards the broadcasters and the FRM are personal data at the basis, the reports itself are anonymized and will no longer contain personal data but general tendencies, volumes and numbers.

Reports generated for external reporting purposes towards the CIM will be used by CIM to improve the quality of their data on the use of the TV medium in Belgium.

Although the input data for this reporting activity are personal data, this information will be pseudonymised prior to delivery to CIM. Based on the data received, CIM will not be able to re-identify the individuals.

Detection of fraud and misuse on Pickx Web

What personal data will Proximus use?

- **Collected data:** Identification and contact information.
- **Observed or generated data:** Product and service subscription information, Technical identifier, Personal data in the context of electronic telecommunications.

What justifies this processing activity?

Our legitimate interest (art. 6(1)(f) GDPR) to detect and block fraud on or abuse of the Pickx Web service.

How long will Proximus process this data?

We retain your personal data for as long as necessary to detect, investigate and stop cases of fraud on or abuse of the Pickx Web service.

With whom does Proximus share these data?

For this purpose, your personal data will be processed by our internal departments involved in fraud detection and prevention. In case fraud or misuse of the service via Pickx Web is detected, this will be reported to the internal Investigations department, who might share information with judicial authorities.

How can I object?

In the case where the processing of your personal data is based on our legitimate interest, if you have a specific reason (motivated request), you can object to our use of your personal data for this purpose. Unless we have compelling grounds to continue using it, we will stop using it.

For more information on the various ways to exercise your rights, you can consult section 5 below.

Pickx Web includes a technical mechanism limiting the number of TV streams that may be consumed simultaneously by a single customer.

Proximus will process personal data to detect service abuse of Pickx Web and identify heavy consumers circumventing this technical mechanism. Once identified, these customers will be reported to our internal departments involved in fraud detection and prevention to take appropriate measures against them. The internal Investigations department of Proximus might in that matter also share information about you with the judicial authorities.

Contests and interactive games on Pickx Web

What personal data will Proximus use?

- **Collected data:** Identification and contact information.

What justifies this processing activity?

When you want to participate in a contest or interactive game on Pickx Web, you consent to the contest rules and to the General Terms and Conditions of the contest or interactive game, as well as to the processing of your personal data in this context.

Additionally, you can consent (art. 6(1)(a) GDPR) to the use of your personal data collected in the context of your participation in the contest or interactive game for marketing and sales purposes.

How long will Proximus process these data?

In case you are participating to a contest or interactive game while being an **end-user** (e.g., family member of the customer of the TV-service), your personal data will be stored and processed for 3 years after you have given your consent. A proof of your consent will be stored for the duration of the consent (3 years) + 5 years, which is the prescription period for any actions before the Belgian Data Protection Authority.

In case you are participating to a contest or interactive game while being the **customer** of the TV-service, your personal data will be stored and processed for as long as you are a Proximus customer + 5 years after the end of your contractual relationship with Proximus. A proof of your consent will be stored for the duration of the consent (3 years) + 5 years, which is the prescription period for any actions before the Belgian Data Protection Authority.

Irrespective of your capacity as **end-user** or as **customer** when participating to a contest or interactive game, your personal data will be kept for 1 year after you participated on the Qualifio platform.

With whom does Proximus share these data?

The form used to organise the contest or interactive game is supported by Qualifio. The personal data entered in the form is shared with this partner, acting on behalf of Proximus.

In case you are (one of) the winners of a contest or interactive game, your personal data may be shared with the company awarding the prize(s), in case the latter is taking care of delivering the prize to you.

How can I withdraw my consent?

You can withdraw your consent, at any time, by contacting privacy@proximus.com.

For more information on alternative ways to exercise your rights, you can consult section 5 below.

Proximus offers customers and end-users of the TV-service access to contests and interactive games via Pickx Web, allowing them to win exclusive prices, advantages or surprises.

Participation in contests and interactive games and related processing of personal data is always subject to the participant's consent. You can, as a participant, withdraw his consent at any time.

Initially, the collected personal data will be collected and stored on the platform of Qualifio for 1 year. The personal data and the proof of the consent will also be stored in Proximus' internal systems.

Promotion of products and services on Pickx

Proximus processes customer's personal data to provide you with personalized recommendations relating to Pickx services (including movie or TV program recommendations) and other Proximus products and services.

For more detailed information about this processing activity, we refer to section '7.2.2.3. Promotion of our products and services on Pickx (Proximus TV)' of the [Proximus Privacy Notice](#).

Personalised advertising on TV

If you give your consent, we offer you the opportunity to benefit from customized advertising on Pickx. These ads mainly relate to products and services of third-party companies.

For more detailed information about this processing activity, we refer to section '7.2.3.1. Personalised advertising on TV' of the [Proximus Privacy Notice](#).

Targeted advertising through TV channels

If you give your consent, you allow the advertising sales houses of our partner broadcasters (www.proximus.be/tvregies) to select and distribute the personalized ads you see on the Pickx service (on your TV box, Pickx app and Pickx website) based on your customer profile and to measure their performance.

For more detailed information about this processing activity, we refer to section '7.2.3.4. Targeted advertising through TV channels' of the [Proximus Privacy Notice](#).

Pickx Newsletter

The Pickx Newsletter informs prospects – based on their consent (art. 6(1)(a) GDPR) – and customers – based on our legitimate interest (art. 6(1)(f) GDPR) - about offers, promotions, products, services or interesting new releases

For more detailed information about this processing activity, we refer to sections '7.1.4. Proximus Newsletters' (for prospects) and '7.2.2.4. Proximus Newsletters' (for customers) of the [Proximus Privacy Notice](#), focussing on the processing of personal data in the context of Proximus Newsletters in general.

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

You can access your personal data

You have the right to request access to your personal data. We will then provide you with an overview of the personal data we process on you, including data processed in Pickx. We will also give you additional information on, for example, why these personal data are processed, the origin of the data, the types of third parties with whom we share your personal data, etc.

Proximus (ex-)customer:

Contact the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By filling out this [web form](#) on the Proximus website; or
- By post to 'Proximus Data Protection Office', Boulevard du Roi Albert II 27, 1030 Brussels.

Not a Proximus (ex-)customer:

Contact the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By post to 'Proximus Data Protection Office', Boulevard du Roi Albert II 27, 1030 Brussels.

You can have your personal data corrected

Some personal data, such as contact details, are available in the MyProximus environment and you can change them there yourself via MyProximus Web (click on your name or avatar in the top right corner > My account > Edit profile) and/or MyProximus in the Proximus+ App (click on the settings icon in the top right corner > Manage your account > Personal data).

If that doesn't work, contact the Proximus customer service on 0800 55 800 or via [chat](#).

You can have your personal data deleted

In certain cases (e.g. when you don't have any Proximus products or services anymore and you would like to have your contact data deleted), you can ask for your personal data to be deleted.

We are unable to delete certain personal data (e.g. billing data) because it is required by law to keep those data.

Contact the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By post to 'Proximus Data Protection Office', Boulevard du Roi Albert II 27, 1030 Brussels.

You can object to the use of certain personal data

You can always object (without a motivation) to the use of your personal data for marketing purposes.

Proximus (ex-)customer

You can adapt the channels and preferences regarding communications for marketing purposes via MyProximus Web (click on your name or avatar in the top right corner > My account > Alerts and Privacy) and/or MyProximus in the Proximus+ App (click on the settings icon in the top right corner > Manage your account > Alerts and privacy).

If that doesn't work, contact the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By post to 'Proximus Data Protection Office' Boulevard du Roi Albert II 27, 1030 Brussels.

You can also follow the instructions in the e-mails and texts you receive from us to stop receiving such commercial messages in the future.

If you want to completely object to the use of your personal data for marketing purposes, you can also register this in MyProximus, submit your request via this [web form](#) or contact the Proximus customer service on 0800 55 800 or via [chat](#).

Not a Proximus (ex-)customer

You can object to the use of your personal data for marketing purposes by contacting the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By post to 'Proximus Data Protection Office', Boulevard du Roi Albert II 27, 1030 Brussels.

You can withdraw a consent previously given

Whenever you give us explicit consent to process personal data for specific purposes (e.g. personalized TV advertisements, personalized advertisements on web and in mobile applications...), you can withdraw the consent previously given at any time.

You can do this via MyProximus Web (click on your name or avatar in the top right corner > My account > Alerts and Privacy) and/or MyProximus in the Proximus+ App (click on the settings icon in the top right corner > Manage your account > Alerts and privacy).

If that doesn't work or if you have another request or question regarding the withdrawal of consent, you can the Proximus Data Protection Office:

- By email to privacy@proximus.com; or
- By post to 'Proximus Data Protection Office', Boulevard du Roi Albert II 27, 1030 Brussels.

6. Changes in the Privacy Notice

Our privacy notice may be expanded or adapted in the future (e.g. to accommodate new developments). For this reason, we recommend that you consult the privacy notice regularly.

7. Contact details of the Data Protection Officer

If you have further questions about our privacy notice, feel free to contact our Data Protection Officer.

You can contact the Proximus Data Protection Officer:

- By email to privacy@proximus.com; or
- By post to '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](#) (Dutch) and [here](#) (French).