



## PRIVACY POLICY

V7.0126

### INTRODUCTION

We, the companies of Rcarré S.A. and Rcube Professional Services S.A. offer a wide range of IT products and services (hereinafter the "Products") such as corporate networks, mobility, websites, VoIP communication, Cloud Computing, server hosting and the provision of IT experts to facilitate business operations.

With the development of new communication and computer tools, we believe it is necessary to pay the utmost attention to the protection of privacy. This is why we are committed to respecting the confidentiality, integrity and security of the personal information we collect about you and that you entrust to us.

### THE PERSONAL INFORMATION WE COLLECT

- .. We may need to collect your personal information for a variety of purposes : processing your orders, correspondence or job applications, supplying equipment or services, contractual relationships, etc.
- .. We may combine the information we collect from you with data obtained from other sources, in order to improve our products and help us personalize our interactions with you.
- .. In addition, we collect information related to your use of the Group's websites ([www.rcarre.com](http://www.rcarre.com), [www.rcube.lu](http://www.rcube.lu)) using various technologies, such as cookies.

### HOW DO WE USE YOUR PERSONAL DATA ?

Personal data, communicated by you or by the company that employs you, or legitimately received by the companies in the group, by companies connected with them or from third parties, may be processed by the companies in the group with a view to :

- .. Supply the Products
- .. Activate the Products
- .. Improve our Products
- .. Ensure business operations and performance
- .. Manage contracts
- .. Ensure customer service
- .. Manage commercial relations and update customer files
- .. Detect, prevent and combat fraud
- .. Compile statistics
- .. Manage disputes and collect debts
- .. Pay for services.

The personal data provided may be processed by Rcarré & Rcube Professional Services for direct marketing purposes (sales actions, personalized advertising, data matching, brand awareness), in order to improve our knowledge of our customers and prospects and to inform them about our activities, products and services.

### HOW DO WE SHARE YOUR PERSONAL DATA ?

We share your personal data with your consent or if it is necessary to complete a transaction or to supply a product you have requested or authorized.

Your personal data may be shared with service providers working on our behalf, acting as subcontractors for the benefit of group companies, who may need access to personal data in order to provide customer service support or help protect and secure our systems and services. In such cases, these companies must comply with our data privacy and security requirements, and are not permitted to use the personal data we pass on to them for any other purpose.

We also share your data when required by law, to respond to legal proceedings, to protect our customers, to maintain the safety of our products and to protect the rights or property of group companies, for the management of litigation and debt collection, and for the settlement of benefits.

### TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

Where applicable, Rcarré & Rcube Professional Services, the companies and/or persons connected with them to whom personal data is communicated, may be located inside or outside the European Union. In the event of data transfers to third parties located outside the European Union, Rcarré & Rcube Professional



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Services comply with the legal and regulatory provisions in force concerning such transfers and, in particular, ensure an adequate level of protection for the personal data thus transferred, on the basis of the alternative mechanisms set up by the European Commission or other contractual provisions.

## HOW DO WE PROTECT YOUR PERSONAL DATA ?

The personal information we collect is kept in a secure environment. The people working for us are trained to respect the confidentiality of your information. To ensure the security of your personal data, we limit it to the strict minimum and use the following measures :

- .. SSL (Secure Sockets Layer) protocol
- .. Access management - authorized person
- .. Access management - person concerned
- .. Network monitoring software
- .. Computer backup
- .. Digital certificate development
- .. Login / password
- .. Firewalls

We are committed to maintaining a high level of confidentiality by integrating the latest technological innovations to ensure the confidentiality of your transactions.

## STORAGE OF YOUR PERSONAL DATA

We retain your personal data for as long as necessary to provide the products and carry out the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. As these needs may vary according to the types of data in the context of different products, actual retention periods may vary considerably.

The criteria taken into account in determining retention periods include the following :

- .. Necessity of conservation to supply the requested products
- .. Sensitivity of the data collected or entrusted
- .. Specific consent or agreed limitation
- .. Legal or contractual obligation
- .. Retention policy adopted by group companies

## RIGHT OF ACCESS, RECTIFICATION, LIMITATION AND OPPOSITION

Group companies adhere to the General Data Protection Regulation EU/2016/679 regarding data protection and guarantees you the following rights :

- .. If the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.
- .. You have the right to consult, rectify and restrict your personal data.
- .. You have the right to object to the processing of your personal data.
- .. You have the right to lodge a complaint with a data protection authority.

## HOW TO CONTACT US

If you have any questions about the confidentiality of your data, you can send your request :

### by post to one of the group's companies :

Rcarre S.A. or Rcube Professional Services S.A.

For the attention of the GDPR Manager,  
38-40, Business Park  
L-8308 Capellen

### by e-mail to Rcarre

[dpo@rcarre.com](mailto:dpo@rcarre.com) or [dpo@rcube.lu](mailto:dpo@rcube.lu)