



PERSONAL DATA PROTECTION POLICY

Introduction

The company Eutelsat S.A. ("Eutelsat") and their affiliates Konnect Broadband Tanzania Limited (Konnect Tanzania), Konnect Africa RDC SARLU (Konnect RDC), Konnect Africa Côte d'Ivoire (Konnect Côte d'Ivoire), which market Konnect's products and services, attach great importance to the protection of privacy and Personal Data for users of its websites and services.

This policy (the "**Policy**") describes Eutelsat and Konnect Tanzania's, Konnect RDC's and Konnect Côte d'Ivoire's commitment to protecting the Personal Data of internet users (the "**Visitors**") and users of its Services (the "**Subscribers**"). It also provides information on the processes for collecting and using your Personal Data, as well as your rights in this respect.

It may be modified at any moment by Eutelsat, in particular in order to comply with regulatory, legal, editorial and/or technical changes.

Before you use the Website, we recommend you refer to the latest version of the Policy, available on the Website.

Eutelsat and Konnect Tanzania, Konnect RDC and Konnect Côte d'Ivoire comply with the data protection national applicable law.

To this end, Eutelsat has appointed a data protection officer responsible for ensuring the compliance of data processing by Eutelsat or its third-party suppliers and to ensure your rights are exercised.

The Policy should be applied in parallel with the conditions of the [Terms and Conditions of Use](#) available on the Website, the definitions of which it includes.

Article 1. Who is responsible for data processing?

Data processing is the responsibility of Eutelsat S.A., 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.

In Tanzania, Konnect Broadband Tanzania Limited, a company incorporated under the laws of the United Republic of Tanzania, registered at the Registrar of Companies of Tanzania, under number 141495127, having its registered offices at Acacia Estates, Street Acacia Estate, Road Kinondoni Plot 80, District Kinondoni, Ward Kinondoni, Postal Code 14110, Dar es Salaam, United Republic of Tanzania, acts as a data processor, as well as the Reseller and/or Sub-Reseller. When Konnect Tanzania and the Reseller and/or Sub-Reseller process your Personal Data they do so following Eutelsat's instruction and in accordance with the purposes of the data processing.

In Democratic Republic of Congo, KONNECT AFRICA RDC SARLU, a company incorporated under the laws of the Democratic Republic of Congo, registered under number RCCM CD/KIN/RCCM 18-B-01453, having its registered offices at Immeuble Start Up, 3 Avenue Bismarck, Quartier Golf, Gombe, Kinshasa, Democratic Republic of Congo acts as a data processor, as well as the Reseller and/or Sub-Reseller. When Konnect RDC and the Reseller and/or Sub-Reseller process your Personal Data they do so following Eutelsat's instruction and in accordance with the purposes of the data processing.

In Ivory Coast, Konnect Africa Côte d'Ivoire, a company incorporated under the laws of Ivory Coast, registered under number RCCM CI-ABJ-2016-B-25203, having its registered offices at Immeuble ELNASR, Avenue du Général de Gaulle, Plateau, Abidjan 01 BP 5754 A, Ivory Coast, acts as a data processor, as well as the Reseller and/or Sub-Reseller. When Konnect Côte d'Ivoire and the Reseller and/or Sub-Reseller process



your Personal Data they do so following Eutelsat's instruction and in accordance with the purposes of the data processing.

Article 2. What Personal Data are collected by Eutelsat S.A., directly or through the Reseller/Sub-Resellers?

In the context of a subscription to Eutelsat's services, during the provision of the Services or within the context of visiting the Website, we collect Personal Data about you, provided directly by you, or automatically and indirectly from our suppliers in order to provide you with these Services.

Eutelsat, directly or through its Resellers or Sub-Resellers, principally processes the following Personal Data, the purpose of which is presented to you 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 IP address, login details...;
- Information relating to the Services subscribed and used: characteristics and identification of equipment for reception of the Service, aggregated consumption reports for commercial purposes, after-sales and helpdesk requests;
- Data from recordings of telephone calls made to the customer care phone numbers indicated on the Website;
- Technical data: data collected using cookies, browsing history, login logs, data relating to the installation of software programmes and apps for the provision of Services;
- Data relating to your use and activity for the Services: user statistics, subscriptions, consumption, type of use;
- Data relating to possible complaints and disputes.

Please consider that when the data is collected in the context of your subscription to the Services, the relevant data will be collected by the Reseller or Sub-Reseller.

When Personal Data is collected, we will let you know whether it is optional or compulsory. As appropriate, the failure to enter compulsory Personal Data may result mean it is not possible to process your request.

Article 3. Why does Eutelsat collect my Personal Data?

Due to its responsibility for data processing, Eutelsat collects (directly or through its Resellers or Sub-Resellers) and processes your Personal Data for clearly defined and legitimate purposes.

Eutelsat processes your data within the scope of your use of the Website, your requests for information or eligibility, and your requests for subscription to our Services.

The table below explains the various purposes for processing your Personal Data and the legal basis on which each one rests.

Purpose	Legal basis
Managing requests for information about Services and eligibility requests	Completion of pre-contractual measures taken following the request by the person concerned
Provision of Services, delivery and installation of equipment for the reception of Services	Contract with the Subscriber (Terms and Conditions of Use)

Subscriber identification and login for the management of Services	Contract with the Subscriber (Terms and Conditions of Use)
Request for information on the Subscriber's credit rating	Legitimate interests of Eutelsat
Invoicing and reception of payments	Contract with the Subscriber (Terms and Conditions of Use)
Managing after-sales service and assistance for Services	Contract with the Subscriber (Terms and Conditions of Use)
Managing cancellation of subscriptions	Contract with the Subscriber (Terms and Conditions of Use)
Managing possible payment recovery	Legitimate interests of Eutelsat
Managing complaints and disputes	Contract with the Subscriber (Terms and Conditions of Use) and Eutelsat's legal obligations
Compiling statistical, use and aggregated consumption data	Legitimate interests of Eutelsat
Managing deployment, security and maintenance operations for the platform and Services	Legitimate interests of Eutelsat
Combating fraud	Eutelsat's legal obligation
Improving packages, customer relations and support	Legitimate interests of Eutelsat
Marketing communications to Subscribers	Contract with the Subscriber (Terms and Conditions of Use)
Sales, surveys, competitions	Permission for sales contact
Storing of data required for the provision of the Services	Eutelsat's legal obligation and operation of the contract with Subscriber (Terms and Conditions of Use)
Response to the request for communication of data by official authorities and bodies	Eutelsat's legal obligation
Response to judicial or official requests and interdiction procedures	Eutelsat's legal obligation

Article 4. Who will my Personal Data be shared with?

Your Personal Data are provided to Eutelsat teams and companies belonging to Eutelsat's group, including Konnect Tanzania, Konnect RDC and Konnect Côte d'Ivoire, third-party suppliers and service providers involved in providing the Services, the management and performance of the contract and the services you have requested.

The Personal Data processed may be sent to the competent authorities, administrations or organisms in the context of legal or regulatory procedures, requisitions or legal decisions and communications requests, or in the context of potential subsidy processes.

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 (directly or through a Reseller or Sub-Reseller), 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 deemed useful for said pre-litigation or litigation.

Article 6. Where will my Personal Data be processed?

The Personal Data collected are processed by Eutelsat and its third-party suppliers (as provided by the European General Data Protection Regulation) within the European Union and: if you are located in Tanzania also within Tanzania, if you are located in Democratic Republic of Congo also within the Democratic Republic of Congo and if you are located in Ivory Coast also within Ivory Coast, respectively.

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 some 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 the security associated with the processing of your Personal Data.

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

On condition of the limits provided by regulations, you enjoy a number of rights 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 your Personal Data that we hold about you;
- The right to request the correction of incorrect or incomplete Personal Data;
- The right to request the deletion of your Personal Data;
- The right to request the limitation of the processing of your Personal Data;
- The right to refuse the processing of your Personal Data for legitimate reasons;
- The right to request the portability of your Personal Data;
- Regarding processing requiring consent, you have the right to withdraw Your consent at any moment;
- The right to specify what happens to your Personal Data after your death.



Please direct any questions regarding exercising your rights by sending an email to the following address: dpo@konnect.com.

In case of a complaint to which Eutelsat cannot give a satisfactory response, you have the right to contact your local Data Protection Authority.

Last updated 14 September 2022