

Personal Data Protection policy

In accordance with prevailing regulations, Parnasse prioritizes the protection and responsible usage of your personal data (hereinafter "personal data") during the course of its business.

This personal data protection policy (hereinafter the "Policy") provides information on how Parnasse, its processors and its partners process your personal data, in compliance with the data regulations.

This Policy applies to customers and users of Parnasse offers and services and visitors on Parnasse's websites and the dedicated application. It might be supplemented by specific information made known to you directly and explicitly, in relation to an offer, a component of your offer or a particular service.

1. WHAT DATA IS PROCESSED?

Parnasse processes your personal data during the course of its relationship with you and your use of its offers and services. Parnasse only processes data that is relevant and required for the indicated purpose.

Personal data collected by Parnasse is grouped into the following categories:

Identification data	Identity (full name, nickname), administrative credentials (identity card, passport, identity card number, passport number, SIREN, tax ID, Kbis, etc.), credentials issued by a non-administrative third party (Facebook account, Twitter account, etc.)
Personal life	Interests, marital status, household composition, lifestyle, customer declaring that they have an offer with a competitor
Professional history	Job, work organization
Personal characteristics	Civility, date and place of birth, date of death, nationality, legal safeguards, customer on a social tariff, physical characteristics, photo or avatar, procuration, signature

Contact data	Postal address, email, telephone number
Location data	Geographic location of the person or equipment associated with a person
Connection data, service usage data and interaction data	Connection and usage logs, traffic data, service report, equipment owned, technician appointment, contents of a request sent to Parnasse, facts in dispute as part of a complaint or legal case, case references, case start and end date, comments on case description and follow-up...
Content data	Sound, image, video, names of stored files and file arrangement
Economic and financial data	Financial identification, economic, tax and accounting data, payment history
Products and services owned or used	Offers and options held, equipment owned, settings, content purchased, applications downloaded
Customer segment, scores and profile	Marketing segment and score, customer satisfaction indicator, whether the customer makes payment or not and potential recovery plan, fraud risk score

On certain occasions, Parnasse may process documents containing data of the categories described above. This may include identity documents, proof of residence, or evidence of various individual situations.

Data collected indirectly through a third party

Some data processed by Parnasse is collected indirectly:

- Using cookies and tracking technologies stored or accessed on your device
- Using sources from partners based on our legitimate interest or legal obligations: data providers, fraud prevention organizations, delinquency management organizations
- Using sources from partners based on your consent
- Open source information

2. WHY DOES PARNASSE PROCESS YOUR DATA?

Your data is processed by Parnasse for specified, explicit and legitimate purposes.

Below, for each lawful basis (contract performance, legitimate interest, consent and legal obligation), you will find the purposes for which Parnasse processes your data:

2.1. Contract performance

2.1.1. Contract performance (only purpose)

To fulfill the contract you have signed, Parnasse processes your personal data for the following purposes:

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Bill and collect payments	<ul style="list-style-type: none"> → Provide a consumption overview → Calculate and bill for the offer or purchase → Send and explain the bill → Collect payment, reimburse → Manage accounts → Return a collected payment to the bank → Manage store tills 	Contract performance
Provide the after-sales service	<ul style="list-style-type: none"> → Access customer context details → Direct the customer to the relevant back office department → Support the customer → Diagnose and manage the problem → Fix a problem remotely → Handle an equipment outage remotely → Take control of the customer's environment remotely 	
Manage personal data, characteristics and rights of a contract	<ul style="list-style-type: none"> → Manage new and modified personal data and information → Suggest and manage changes to personal information → Gather and use additional required personal information 	

<p>Maintain the quality of response time experienced by Fiber or ADSL internet customers</p>	<p>→ Detect network equipment causing a decline in network performance to implement the required corrective actions</p>
<p>Offer an email service</p>	<p>→ Create and manage the email address until its deletion → Send and receive emails and their attachments securely and store them until the email is deleted by the user → Aggregate emails from other email providers → Send notifications → Manage an address book</p>

3

	<p>→ Manage a calendar and export emails</p>
<p>Provide a voicemail service</p>	<p>→ Save voicemails and send notifications that a new voicemail has been received → Delete voicemails, either on customer request or after an expiry date → Manage preferences for certain mobile customers → Transcribe voicemails into text by SMS</p>
<p>Manage equipment</p>	<p>→ Prepare, set up, ship, deliver, repair, recycle, refurbish, exchange, collect or destroy</p>
<p>Sign in to a Parnasse service or a third-party service via the Mobile Connect service</p>	

<p>Attend a customer call-out</p>	<ul style="list-style-type: none"> → Inform the customer of the call-out → Allow the customer to communicate with the technician attending the appointment → Install → Repair, collect and uninstall equipment → Allow the customer to review the service after a technician appointment → Allow the technician to optimize their call-out schedule and journeys
<p>Manage outstanding payments</p>	<ul style="list-style-type: none"> → Recover payment amicably → Take legal action against customers → Recover a customer's outstanding payments through legal action → Input information into the GIE Préventel database → Check delinquency records when starting a new mobile subscription and charge a security deposit, if necessary

2.1.2. Contract performance and legitimate interest

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
<p>Deploy and operate networks</p>	<ul style="list-style-type: none"> → Build, operate and optimize networks → Handle network damage cases through to recovery → Service networks, preventively or following an incident → Set up networks 	<p>Contract performance or legitimate interest</p>
	<ul style="list-style-type: none"> → Route communications 	<p>Contract performance</p>
<p>Process cancellations</p>	<ul style="list-style-type: none"> → Manage cancellations by the customer or their representative 	<p>Contract performance</p>
	<ul style="list-style-type: none"> → Manage cancellations by Parnasse 	<p>Legitimate interest</p>

Manage incoming mail	→ Receive, scan and archive letters / documents	Contract performance or legitimate interest
Deploy and operate products and services	→ Provide the customer with analysis reports for their usage or offers → Operate services → Allow the customer to manage configuration of their products and services	Contract performance or legitimate interest
Study network deployment	→ Study and prepare for network deployment	Contract performance or legitimate interest

2.1.3. Contract performance and consent

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Manage the order	→ Gather and manage the information needed for the order	Contract performance
	→ Manage order status: approved, canceled/withdrawn, rejected	
	→ Manage order delivery: prepare, ship, track delivery	
	→ Deliver and install the order	
	→ Gather consent for requests outside orders	Consent

2.1.4. Contract performance and legal obligation

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
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Process complaints	→ Receive and review the complaint, make the necessary corrections, explain these corrections, and potential gesture of goodwill or customer refund	Contract performance
	→ Prepare a file for the electronic communications ombudsman	Legal obligation
Communicate regarding customer management	→ Target and send the communications needed for contract performance to customers	Legal obligation and contract performance

2.1.5. Contract performance, consent and legitimate interest

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Manage digital advertising activities (on computer, mobile, set-top box)	→ Target and display advertising	Legitimate interest or consent
	→ Collect and sell data	Consent
	→ Sell advertising	Legitimate interest or consent
Analyze the uses of products and services to make proposals to the customer	→ Analyze the customer context, identify potential needs and make proposals	Consent, Contract performance or legitimate interest
	→ Propose targeted advertising from Orange Group partners or subsidiaries on different Parnasse sites	Consent
	→ Provide information and interact on Parnasse news	Legitimate interest or consent

Organize events and activities	→ Organize in-person events (demonstration, seminar, etc.)	Contract performance, legitimate interest (customers), consent (prospects)
	→ Organize and coordinate communities of interest	Legitimate interest / contract performance
	→ Propose a business transaction (offer of refund)	Contract performance
Organize contests	→ Propose activities and games (contests, prize draws, etc.)	Legitimate interest (customers), consent (prospects)
	→ Organize and coordinate activities and games	Contract performance
Provide the presales service and sell	→ Identify the prospect or customer and their needs or offers	Consent
	→ Manage interest in certain offers and services	
	→ Gather and record acceptance of the business proposal	
	→ Propose and sell offers from Orange and its subsidiaries: canvass, manage customer appointments, present offers, manage business and contract documents	Consent and contract performance
	→ Manage store queues	Legitimate interest
Provide universal and non-universal information services	→ Publish a directory, with universal and nonuniversal information, and act as an intermediate operator pursuant to ARCEP decision no. 06-0639	→ Contract performance → Legitimate interest → Legal obligation

2.2. Legitimate interest

2.2.1. Legitimate interest (sole purpose)

Parnasse also carries out data processing for purposes other than the strict performance of your contracts. Based on its legitimate interest as a company to develop its business and customer relations, Parnasse processes your personal data.

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Ensure the security of information technologies	<ul style="list-style-type: none"> → Supervise usage and detect abnormal behavior when using application services → Audit and assess vulnerabilities → Protect data and control access and usage of applications and services → Anonymize personal data 	Legitimate interest
Supervise the billing system		
Avoid fraud and protect sales	<ul style="list-style-type: none"> → Control processes on our sales channels → Check and manage additions and removals from the national inter-operator payment default database – GIE Préventel – and the Parnasse payment default database → Estimate and prevent risks of customer payment default → Detect and supervise suspicious situations that might impact sales and/or suggest fraud to limit risk and carry out the necessary remediation actions → Create a record of evidence for fraud investigations 	
Survey customers or users	<ul style="list-style-type: none"> → Measure the quality of an action following a customer request → Improve customer insight through customer surveys 	

<p>Improve our offer and customer relations</p>	<p>→ Measure, categorize and understand customer requests and survey responses to scale and improve the customer relationship and to improve our products and services → Measure, understand and improve the performance of customer journeys → Improve customer satisfaction → Analyze our sales to adapt our offers, products and services</p>	
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	<p>→ Improve customer insight through studies → Make analysis tools and data available internally to improve our customer relations</p>	
<p>Measure store traffic</p>	<p>→ Provide traffic reports for physical points of sale → Measure the efficacy of advertising actions regarding store traffic</p>	
<p>Identify a customer via their account using the Orange ID service</p>		

2.2.2. Legitimate interest and contract performance

See 2.1.2.

2.2.3. Legitimate interest and consent

<p>PURPOSE OF PROCESSING</p>	<p>DESCRIPTION</p>	<p>APPLICABLE LAWFUL BASIS</p>
<p>Market and optimize smart devices and the associated offers</p>	<p>→ Optimize smart devices and offers</p>	<p>Legitimate interest</p>
	<p>→ Send notifications, propose a range of smart devices interacting with a home automation system or dedicated service platform</p>	<p>Consent</p>

Organize direct marketing operations	→ Carry out marketing operations	Legitimate interest (customers), consent (prospects and former customers)
	→ Carry out relational campaigns	
	→ Prepare and send written marketing communications	
	→ Propose targeted and adapted offers from our partners and our subsidiaries	Consent

2.2.4. Legitimate interest and legal obligation

9

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PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Manage our environmental impact	→ Process environmental complaints about a specific store or installation	Legitimate interest
	→ Calculate and report on carbon footprint	Legal obligation

2.3. Consent

Parnasse gathers your consent for specific processing of your personal data. You can withdraw your consent at any time.

2.3.1. Consent (sole purpose)

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
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Improve the quality of service of our networks by collecting device information	<ul style="list-style-type: none"> → Improve the quality of service of our networks → Improve customer satisfaction regarding quality of networks, offers and customer relations → Optimize the quality of service of our networks 	Consent
Survey prospects		
Identify a customer via their account using the Orange ID service		
Make personalized recommendations on Orange TV – the TV Guide	<ul style="list-style-type: none"> → Propose personalized content and offers to Orange TV customers depending on their consumption of Orange TV services 	

Target advertising on Orange TV	<ul style="list-style-type: none"> → Gather customer consent to receive targeted advertising from Orange partners → Analyze usage to calculate, optimize and provide targeting criteria → Establish the TV viewer's profile 	
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2.3.2. Consent and contract performance

See 2.1.3.

2.3.3. Consent and legitimate interest

See 2.1.2.

2.4. Legal obligation

Parnasse must meet its legal or regulatory obligations, and therefore it must process your personal data in certain ways.

2.4.1. Legal obligation (sole purpose)

PURPOSE OF PROCESSING	DESCRIPTION	APPLICABLE LAWFUL BASIS
Archive accounting data		Legal obligation
Respond to requests from third parties authorized by regulations		
Respond to requisitions from the authorities and court decisions		
Manage the legal record of transactions	→ Fight tax fraud and the handling of stolen goods	

11

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Manage data subject requests to exercise their rights	→ Receiving complaints, claims and/or requests to exercise rights	
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13

<p>Block phones declared as stolen when used</p>		
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2.4.2. Legal obligation and contract performance

See 2.1.4.

2.4.3. Legal obligation and legitimate interest

See 2.2.4.

3. HOW LONG IS YOUR DATA KEPT?

Your Personal Data is kept for the following periods:

- **Data used to manage the business relationship and for marketing purposes:** a residential customer’s data is kept for 3 years from the end of the business relationship. A business customer’s data is kept for 5 years from the end of the business relationship. A prospect’s data is kept for 3 years from its collection or the last contact by the prospect.
- **Customer identification data pursuant to articles L34-1 and R10-13 of the Postal and Electronic Communications Code:** this data is kept for 5 years from the end of the business relationship.
- **Connection, service usage and interaction data:** this data is kept for two years from collection, except for traffic data pursuant to article L34-1 of the Postal and Electronic Communications Code, which is kept for one year from collection.
- **Data from interactions with Parnasse customer services:** written conversations (echat) are kept for 13 months. Verbal conversations are recorded randomly (sampling) and kept for 6 months.
- Content data for services sold by Parnasse is kept for the time to deliver the service (routing, provision of content and access to content).
- **Payment data:** this data is kept for 13 months following the debit date as proof, and up to 15 months to cover the possibility of using deferred payment cards.

- **Data about customer segment and score:** this data is kept for up to 2 years from its calculation.
- **Data used for default management:** in the event of non-payment, this information is kept for up to 56 months after cancellation, a period that might be extended by a period corresponding to the maximum time during which a mobile customer can be listed in the GIE Préventel database. In the event of payment, information is kept for 48 hours after payment.
- **Specific data used to avoid fraud and protect sales:** alert data in the event of fraud is kept for 12 months after the alerts are sent to qualify them. Non-qualified alerts are deleted directly. Alert data in the event of proven fraud is kept for a maximum of 5 years from closure of the fraud file. Anti-money laundering data is kept for 5 years from completion of the transaction. Proof of identity: Kept for up to 18 months from collection for fraud prevention purposes.
- **Data to arrange contests:** data is kept for 3 months and up to 6 months after the end of the contest if there is a high risk of dispute.
- **Data to manage our environmental impact:** to process environmental complaints, data is kept for 12 months from collection or filing of the complaint. To calculate and report on carbon footprint, data is not kept.
- **Data about geographic location to deploy and operate networks and services:** this data is kept for up to 6 months from collection.
- **Cookies and tracking technologies:** information from cookies and tracking technologies is kept for 25 months. For more information, Parnasse invites you to read its Cookie Policy at Parnasse.fr.
- **Data related to directories:** data is kept for two years after your data stops being published in the directory.
- **Data processed as part of the Mail Orange email service for internet offers:** usage logs are kept for 12 months from issue. Other data is kept for 12 months from customer cancellation if they no longer use the service. If the customer no longer uses the email service more than 9 months after cancellation, the data is kept for 5 months after the service stops being used.

- **Data processed as part of the Mail Orange email service for mobile offers:** usage logs are kept for 12 months from issue. Other data is kept for 6 months from customer cancellation.
- **Specific data processed as part of the voicemail service:** identification data (telephone number) and contact data (email) is kept throughout the term of the contract and deleted 20 days after cancellation. Voicemail content data is kept for up to 40 days if there is no customer action, and 14 days if the message is read by the customer.
- **Specific data processed to identify the customer via their account using the Orange ID service:** log data when using the service is kept for 370 days.
- **Specific data processed for personalized recommendations on Orange TV – the TV Guide:** connection, service usage and interaction data is kept for 18 months. Other data is kept whilst the customer actively uses the TV service.
- **Specific data processed for targeted advertising on Orange TV:** identification data is kept for 13 months. Contact data and personal life data is kept for up to 3 years from customer cancellation. Connection, service usage and interaction data (TV log and usage, consent) is kept for 13 months. Customer profiles, scores and segments are kept for up to 13 months, and they are recalculated on a daily, weekly or monthly basis, as required.
- **Data used to take legal action:** data is kept whilst the legal action is active, and until all routes of appeal have been exhausted.

Parnasse also keeps data as part of its legal obligations:

- **Accounting data that must be archived:** this data is kept for 10 years in an archive database for evidence purposes.
- **Data to respond to the authorities' right to disclosure and requisitions by the authorities and court decisions:** this data is kept for 3 years from the response.
- **Data about the legal record of transactions:** this data is kept for 10 years after collection.

- **Data about requests to exercise data subject rights:** this data is kept for 5 years after processing the request or, failing this, from the statute of limitations of a decision by the competent supervisory authority or the statute of limitations of legal action.
- **Data required to block mobiles declared as stolen when used:** this data is kept for 18 months after the date of registration.

4. WHO ARE THE DATA SUBJECTS?

The data subjects subject to processing by Parnasse under this Policy are:

- **Customers with a Parnasse offer and users**
- **Prospects**
- **Beneficiaries, representatives and agents of these customers**

5. WHO RECEIVES YOUR DATA?

Processed data is sent to **Parnasse internal services (including your coaches) and its subsidiaries:** only authorized employees who need access to your data for their job can access it.

Depending on the offer, processed data might be sent **to Parnasse subcontractors:** in this case, Parnasse only sends your data to subcontractors with which Parnasse has concluded a contract through which they guarantee their commitment and provide guarantees regarding their ability to meet security and confidentiality requirements and respect all legal and regulatory obligations in terms of personal data protection.

Processed data might also be sent to **Parnasse partners,** both public and private: these are situations where partners are involved to provide additional offers or services. This might also include processing for which you are asked to provide consent; information will be made available before gathering your consent.

Finally, the processed data may be sent **to the competent authorities,** at their request, as part of legal proceedings, as part of legal research and requests for information from the authorities or in order to comply with other legal obligations. Finally, it may be sent **to third parties authorized through a court decision.**

6. IS YOUR DATA PROCESSED OUTSIDE THE EU?

The personal data collected may be processed outside the European Union. In this case, Parnasse takes the necessary measures with its subcontractors and partners in order to guarantee an adequate level of protection for your personal data, in line with applicable regulations.

If the subcontractors and partners in question are not located in a country with legislation considered to offer an adequate level of protection, they will have signed the 'standard contractual clauses' of the European Commission or will be subject to binding internal rules approved by the authorities. If the law of the third country does not offer protection that is equivalent to the protection offered by the European Union's regulations, Parnasse ensures it will implement additional measures adapted to the processing.

7. HOW IS YOUR DATA KEPT SECURE?

Parnasse endeavors to protect your personal data.

Parnasse has implemented appropriate and stringent security measures to avoid your data being accidentally lost, used or consulted without permission, modified or disclosed. Parnasse also limits access to your data solely to the employees, subcontractors and other third parties that need to access it to perform their duties. They are bound by an obligation of confidentiality.

Parnasse requires its co-contractors to respect the security of its customers' Personal Data, and to process it in accordance with prevailing data protection laws.

To this end, Parnasse has put in place appropriate technical and organizational measures to avoid your personal data being lost, misused, altered or deleted. These measures are adapted according to the level of sensitivity of the data processed and the level of risk.

Parnasse has implemented procedures to detect, analyze and handle any suspected breach of your personal data, and it will notify you and any relevant supervisory authority of a breach if Parnasse is legally or contractually required to do so.

8. WHAT ARE YOUR RIGHTS?

You have different rights over your personal data:

8.1. Right of access

You have the right to obtain any personal data that Parnasse holds about you, and to know about any processing of your personal data by Parnasse.

8.2. Right to rectification

If your personal data is not complete, accurate or up-to-date, you have the right to rectify it.

8.3. Right to object

This right applies when the processing is based on Parnasse's legitimate interest, and if your rights and freedoms override this legitimate interest. When your personal data is processed for marketing purposes, you can object to this form of processing of your personal data at any time. Customers can exercise this right directly from their customer account.

8.4. Right to erasure

You can ask Parnasse to delete your personal data. But you cannot exercise this right if your personal data is needed to supply your services, or if it is needed for Parnasse to abide by its legal obligations or exercise its rights, or if Parnasse's legitimate interest prevails.

8.5. Right to data portability

17

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You can ask to obtain your personal data in a format that is technically usable by you or an entity other than Parnasse, if processed based on your consent or a contractual relationship.

8.6. Right to restrict processing for one or several purposes

If there are doubts about the lawfulness of our processing or to establish, exercise or defend your legal rights, this right allows you to ask Parnasse to not perform some or all processing of your personal data temporarily, without necessarily deleting it.

8.7. Digital will

You can also give instructions on the retention, deletion or disclosure of your personal data after your death.

9. HOW CAN YOU EXERCISE YOUR RIGHTS?

You can exercise your rights at any time, as well as contact the Data Protection Officer at the following address: desk@parnasse.fr or by writing to:

Orange / Parnasse Gestion des données personnelles
111, quai du Président Roosevelt
92130 Issy-les-Moulineaux

Any request to exercise your rights must be accompanied by documents proving your identity. An identity document might be requested if there is reasonable doubt regarding your identity.

A response will be sent within one month from receipt of the request. If the request is complex, this period might be extended. In this case, you will be notified.

Option to contact the Data Protection Officer (DPO)

You can also write to group-dpo.donnees-personnelles@orange.com to exercise your rights.

Option to file complaint with CNIL

If discussions with Parnasse have not been satisfactory, you will have the right to file a complaint with the French Data Protection Authority (CNIL), the authority responsible for ensuring compliance with personal data protection obligations in France.

10. ARE THERE SPECIFIC TERMS FOR SOME SERVICES?

10.1. Directories

As an electronic communications operator, Orange allows you, as a public telephone service subscriber (landline or mobile), to decide whether or not you would like your contact details (telephone number, full name, full or partial postal address, email address, job or activity) to be published, free-of-charge, in its directory list. In accordance with its regulatory obligations, this list is sent by Orange to any publisher creating a directory or providing an information service.

You can limit their publication free-of-charge by joining anti-marketing lists, or prohibit any publication by asking to be unlisted.

You can change your mind at any time, free-of-charge, in your customer account.

10.2. Use of anonymous data – Flux Vision

Data about the location of Orange mobile network users is aggregated to create visit statistics to and from various partners in retail, tourism, transport, etc.

The technical device used by Flux Vision guarantees irreversible anonymization by deleting any personal data and making it impossible to identify an individual, as well as directly or indirectly re-identify them.

11. MODIFICATION OF THE DATA PROTECTION POLICY

This Personal Data Protection Policy may be subject to change.
Last update on 13/02/2025.