



Privacy statement for customers of Sudstrom S.à r.l & Co S.e.c.s. (Sm-PrivacyStatCust)

1 General information

Last updated	12/01/2023
Commitment of Sudstrom	Respecting everyone's privacy is the objective of Sudstrom S.à r.l & Co S.e.c.s. We are committed to protecting and processing your personal data in strict compliance with European Regulation 2016/679 ¹ .
Scope and target audience	This privacy statement applies to all PII you provide when contacting a Sudstrom representative or when using any of the applications developed by Sudstrom and accessible through the www.sudstrom.lu website.
Responsible for processing your data	Sudstrom S.à r.l & Co S.e.c.s. 11, rue de Luxembourg L-4220 Esch-sur-Alzette
DPO contact	In order to ensure compliance, Sudstrom S.à r.l & Co S.e.c.s has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address for any questions regarding the security of your data: dpo@sudstrom.lu .
Modifications	Sudstrom may change this privacy statement by posting an updated version on our website.

¹ <http://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:32016R0679&from=FR>

2 Principles at Sudstrom

Sudstrom attributes great importance to the protection of personal data and the respect of privacy. This is confirmed by the implementation of a data protection policy specific to Sudstrom.

Sudstrom's approach as a company is based on six principles:

- a. we always use your PII in a fair, trustworthy and transparent way for specified, explicit and legitimate purposes;
- b. Sudstrom is committed to taking all appropriate technical and organisational measures to protect the security of your personal data and in particular the confidentiality, integrity and availability of your personal data.
- c. you have the right to be clearly informed about how we use your PII. Sudstrom will always be transparent to you about the data we collect and the way we use it;
- d. If you have any concerns about our handling of your personal data, we invite you to contact us and we will try to answer your questions as soon as possible.
- e. We will take all reasonable steps to protect your data from misuse and to keep it secure.
- f. Sudstrom cooperates with the Commission Nationale pour la Protection des Données (hereinafter, the CNPD), having its registered office at L-4361 Esch-sur-Alzette, 1 avenue du Rock'n'roll.

3 Rules of conduct at Sudstrom

3.1 What is the mission of Sudstrom?

In the context of the execution of its tasks in the public interest, Sudstrom processes and uses your personal data in accordance with the legal provisions, namely:

- ☉ Loi du 3 février 2021 modifiant la loi modifiée du 1er août 2007 relative à l'organisation du marché de l'électricité ;
- ☉ Loi du 1er août 2018 portant organisation de la Commission nationale pour la protection des données et mise en œuvre du règlement (UE) 2016/679 du Parlement européen et du Conseil du 27 avril 2016 relatif à la protection des personnes physiques à l'égard du traitement des données à caractère personnel et à la libre circulation de ces données, et abrogeant la directive 95/46/CE (règlement général sur la protection des données), portant modification du Code du travail et de la loi modifiée du 25 mars 2015 fixant le régime des traitements et les conditions et modalités d'avancement des fonctionnaires de l'État.
- ☉ Loi du 30 mai 2005 sur les réseaux et les services de communications électroniques et Loi du 30 mai 2005 portant organisation de la gestion des ondes radioélectriques ;
- ☉ Loi du 3 février 2021 modifiant la loi modifiée du 1er août 2007 relative à l'organisation du marché de l'électricité ;
- ☉ Règlement grand-ducal du 7 août 2015 relatif au fonctionnement du mécanisme d'obligations en matière d'efficacité énergétique.
- ☉ Loi du 28 mai 2019 portant transposition de la directive (UE) 2016/1148 du Parlement européen et du Conseil du 6 juillet 2016 concernant des mesures destinées à assurer un niveau élevé commun de sécurité des réseaux et des systèmes d'information dans l'Union européenne et modifiant 1° la loi modifiée du 20 avril 2009 portant création du Centre des

technologies de l'information de l'État et 2° la loi du 23 juillet 2016 portant création d'un Haut-Commissariat à la Protection nationale.

3.2 What are the purposes of the treatments?

The collection and processing of your PII is limited to the following purposes:

- Order processing and handling;
- Issuing customer invoices;
- Managing and limiting unpaid bills;
- Installation and connection of meters;
- Supply of electricity;
- Distribution of modems and decoders;
- Providing telecommunications, internet and television services;
- Informing customers through the customer portal;
- Information about events and marketing campaigns.

The data may also be used for statistical, research and archiving purposes in accordance with applicable legislation.

3.3 Who is concerned by data processing?

This concerns all customers of Sudstrom S.à r.l & Co S.e.c.s as electricity consumers, meter tenants or users of telecommunications, internet and television services.

3.4 How is your PII collected?

Concerning the persons mentioned in point 3.3, data are collected from

- information you give us directly;
- Information from state authorities such as the National Register of Persons, the National Health Insurance Fund, Occupational Health, etc;
- Information we collect through automated collection systems: system logs, badges, etc;
- Information collected on the Sudstrom website.

3.5 What PII does Sudstrom have at its disposal?

'PII' means information that identifies you or makes you identifiable. This may include in particular, but is not limited to:

- Sudstrom customers' personal data (surname, first name, matricule, address, telephone number, marital status, e-mail address, etc.);
- Sudstrom customers' bank details are stored for billing purposes;
- Electricity consumption data of Sudstrom's customers;



- Customer data from telecommunications, internet, and television;
- Log data (each access to the customer area is logged with username, date and time) and (session) cookies to maintain sessions in the customer area (closed) and for investigation in case of fraudulent access.

3.6 How long is the data retained?

Your personal data is kept for the time necessary to achieve the above-mentioned purposes.

These periods may, however, be increased by the need to apply statutory limitation periods. The retention periods have been defined in the record of processing activities and can be consulted on the premises of itrust consulting.

Depending on the purpose or provisions of the archiving laws, the retention period could be extended. Indeed, some images are kept and used for historical purposes.

In anonymised form, your personal data may be used for statistical purposes beyond the above-mentioned retention period.

3.7 With whom is your PII shared?

As a rule, we do not share your personal data outside Sudstrom. However, we may use carefully selected and monitored subcontractors to assist us in processing your data. If you want to have the list of subcontractors, you can contact our DPO, see chapter 3.10. It may also happen that (in the event of a service disruption) anonymised versions of your data are shared with private or public emergency services.

3.8 Are your PII transferred to third countries (outside the EU and partner countries)?

We do not transfer any of your personal data to servers outside the European Union and use subcontractors who agree to store your data within the European Union. If we change our policy, we will do so in accordance with data protection laws and you will be informed.

3.9 How is your PII protected?

We aim to keep your personal data as secure as possible and only for as long as is necessary for the purposes for which it is processed. In this respect, we take appropriate physical, technical and organisational measures to prevent the modification or loss of your data as far as possible and appropriate.

When Sudstrom works with other companies, the selection of these companies is made only after a thorough selection process. During this selection process, each individual service provider is carefully assessed for its technical and organisational data protection competence.

Access to your personal data is restricted to prevent unauthorised access, modification or misuse and is only permitted to our agents who need the data for their work.



3.10 What are your rights and how do you exercise them?

The legal rules on the protection of PII, in particular the rights of the data subjects concerned by the processing operations carried out are applicable under the relevant conditions and subject to the exceptions and derogations provided for.

For questions relating to the processing of your data or in order to exercise your rights, you may contact the Data Protection Officer of Sudstroom,

- by sending an email to the following address: dpo@sudstroom.lu.

- or by registered mail to:

Sudstroom S.à.r.l & Co S.e.c.s.
Data Protection Officer
11, rue de Luxembourg
L-4220 Esch-sur-Alzette

while enclosing with your application a legible and valid copy of your identity document and, if applicable, that of the person for whom you are the legal representative.

If you have any questions, you can also contact the person who carried out the data processing directly.

You have the right to:

- request a copy of the PII that Sudstroom holds about you;
- ask Sudstroom to correct, update, or delete your PII from its files, and
- to report to Sudstroom any misuse of your PII.

In the event of a request for deletion of your data, Sudstroom will check that there are no other purposes or rights of another data subject that would oblige it to keep them. In this case, the decision should be notified.

If you request a copy of your file, Sudstroom will analyse it in order to delete any information on other persons.

If you believe that your personal data have not been processed in accordance with the law, you have the right to contact the CNPD (www.cnpd.lu) or to lodge a complaint with them.