



Privacy policy

Version	Date	Author
1.0	April 2024	Judith Fierens

BICS understands your need for privacy and knows that privacy is also an important issue for you. That is why we do everything possible to respect your privacy when you use our website or our services and when you interact with us for any matter.

This Privacy Policy describes how BICS collects, processes and protects personal data. We also outline the rights you may have in respect to that data. The Policy relates to the information we gather in our publicly accessible websites (the “Sites”), the data in relation to products we sell and the services we provide or procure through commercial agreements, by which we collect, store or process otherwise your personal data or personal data of your end users or employees, and for which we become controller upon collection of the data. For the purposes of this Policy, any reference to “Services” is a reference to all the products and services offered by BICS. In some cases, where BICS acts as wholesale carrier, and as such does not offer its Services to the end-user directly, your data will only be involved if a company with whom you have a commercial service contracted engages with BICS for the use of our Services.

In this Privacy Policy, the words “our”, “us”, “we” and “BICS” refer to Belgacom International Carrier Services SA/NV, our affiliates (which includes any person or entity that controls us, is controlled by us, or is under common control with us, such as our subsidiaries, parent companies) or our employees. In this Privacy Policy, the words “your” and “you” refer to the individual visiting the Site in his/her own name or on behalf of the company or entity he/she represents, as well as the individual whose personal information may be processed by BICS as part as our Services, such as an end-user of one of our customers.

In order to provide you with a short overview on how your data is process, we have prepared this summary which will allow you to understand, at a glance, the operations for which your data is collected, shared with third parties, and otherwise processed. You will find a more detailed description on each of these activities below:

Data processed	How is it collected	For which purposes	Is it shared with others?
Contact information	When you submit an application for a job opening, when you visit BICS offices, Via registration to our services or for information about our services When you obtain a MyBics account Newsletter Any other type of contact to BICS publicly available sources	HR selection process Fulfilment of a contract Management of claims Event management Troubleshooting Marketing activities Fulfil legal obligations & respond to law enforcement request	Human resources partners Third party service providers (outsourcing) Marketing and business development partners
Contact information	Visiting the Sites	Understand and improve your browsing experience	Marketing and business development partners
Electronic communications data (traffic data, metadata)	Via the use of our services	Manage our Services Troubleshooting & network security Fulfil legal obligations & respond to law enforcement request. Fraud prevention	Customers and suppliers in the delivery of services Law enforcement agencies and other regulatory bodies Customers / suppliers in the context of a dispute settlement. Fraud prevention & analytics partners

Which data do we collect?

- **Contact Information:** Contact and related information that allow us to communicate with you. We obtain this information when you order or register to receive any of our Services or information about our Services, events, job openings or vendor sourcing. We collect or receive information from you when you obtain a MyBICS account, sign-up to our newsletter or otherwise contact us. The type of information that we collect depends on your interaction with us, but may include, your name, address, telephone number (business or personal), email address (business or personal), postal/billing address (business or residential), and any other information that you choose to provide or is necessary for us to provide Services or information to you.
- **Website Connection Data:** We register information about the connection you make to our BICS Sites and the software and devices you use to accomplish this. This information includes your IP address, the time of your visit on the website, the type of browser and the type and brand of equipment you use and the pages you visit. Our Cookies Policy, available on our Site, also applies.
- **Electronic Communication Information** related to or processed as part of the Services we provide. This may include information about how you use our networks, and Services. Some examples include: phone numbers, IP addresses and Call Detail Records (CDRs) which include where a call was made from and to as well as its date, time, duration, cost and location (but excluding the content of the communications).

How do we collect it?

We may collect the above personal data in the course of providing Services to you or when you place an inquiry through our Site or by other contact means available to you. We may obtain this information in a number of ways, for example:

- **Directly from you:** for example, when you provide your details in order to subscribe to our newsletter, submit a web inquiry, get access to a MyBICS account, complete a job application; when you submit your data through our Sites or over any customer service hotlines; or during the ordinary course of our business relationship with you; or when we are legally required to do so.
- **Automatically:** when personal data is generated through your use of our Services, or our Sites; and
- **From third parties:** we sometimes collect personal data about you from publicly available sources or from trusted third parties, in connection with Services that we provide to you or propose to provide to you or in connection with information you request from us, where appropriate and to the extent we have a justified basis to do so. These include connected network providers, business, and fraud-prevention partners.

How do we use the data we collect?

We set out below some of the ways in which we process personal data:

- for selection purposes, in relation to applicants seeking for a job posting with BICS;
- to fulfil obligations under a contract. This includes providing our Services to our customers; to communicate with them about the usage of our Services; to obtain and process payment from customers and to fulfil your orders for Services and any obligations on us relating to those Services;
- to monitor the performance of our Services;
- to better understand how customers and other third parties access and use our Sites and Services, both on an aggregated and individualized basis;
- • to administer, monitor, improve and customize our Sites and Services, for our internal operations, including troubleshooting, fraud prevention, network management and network optimization, research and analytical

purposes, so that we can provide our customers with a better customer experience and maintain the security of our networks;

- to investigate, prevent or act regarding illegal activities, fraud, threats to our property or personnel and violations of our Terms of Use and/or applicable law and also to meet our legal and regulatory obligations;
- to process your application to attend an event; if you attend an event, we may process information about you gathered in relation to the event and may share information about your attendance with your company. We may also permit designated event partner or conference sponsors to send you communications related to the event if you have shared your contact information at the event or when subscribing to the event. Please note that sponsors from other companies may directly request information about you at their conference booths or presentations, and their use of your personal data that you provide to them will be subject to their privacy policies;
- to assist us in advertising our products and services to other companies in various mediums including, sending promotional emails, advertising our services on third party sites and social media platforms, direct mail, and by telemarketing;
- if required by law, regulation or the public interest such as in response to requests or orders by government or law enforcement authorities conducting an investigation or to respond to an emergency. This use may require us to disclose your personal data including contact details and/or information about your usage of our Services to relevant authorities or to block, intercept or otherwise interfere with your use of our Services and any personal data generated by that usage. In doing so, we will always attempt to achieve a balance between, on the one hand ensuring protections for the privacy and other fundamental human rights that may be exercised through use of our Services and, on the other, the exercise of lawful investigatory powers for the public good

Why do we share that data with others?

Unless you give us your permission, we don't share your data with third parties, except as described below:

- Other parties involved in the performance of the Services we provide you, such as other network connectivity services providers and communications operators
- Third-party service providers or consultants. We may share data collected from you on the Sites with third-party service providers or consultants who need access to the data to perform their work on BICS' behalf, such as a website analytics company or our third-party advertising partners. These third-party service providers are limited to only accessing or using this data to provide services to us and must provide reasonable assurances that they will appropriately safeguard the data.
- Compliance with Laws. We may disclose your data to a third party if (i) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or government request (including to meet national security or law enforcement requirements), (ii) to enforce our agreements and policies, (iii) to protect the security or integrity of the BICS Site or our services and products, (iv) to protect ourselves, our other customers, or the public from harm, fraudulent or illegal activities, or (v) to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a serious crime from being committed. If BICS is required by law to disclose any of your data that directly identifies you, then we will use reasonable efforts to provide you with notice of that disclosure requirement, unless we are prohibited from doing so by statute or court or administrative order. Further, we object to requests that we do not believe were issued properly.
- BICS group of companies. We may share data with our affiliates as well as with other companies within our group. We all will only use the data as described in this Policy.
- Business transfers. If we go through a corporate sale, merger, reorganization, dissolution or similar event, data we gather from you through our website may be part of the assets transferred or shared in connection with due

diligence for any such transaction. Any acquirer or successor of BICS may continue to use the data we collect from you through our Sites as described in this policy.

Aggregated data.

We might also share data with a third party if that data has been aggregated in a way that does not directly identify you. We may also pseudonymize your data before sharing them with third parties to be able to associate you again with these data once they are returned to us, but without allowing such third parties receiving the pseudonymized data to identify you. We do not share your data with third parties for their direct marketing purposes unless you give us your consent to do so. When the use and sharing involve international transfer of data as needed for the contracted Services or for the specific processing that is involved, we require the third-party recipients to comply with all applicable data protection laws and whereby the contract is based on EU Commission standard contractual clauses or any other mechanism providing adequate protection of your data.

Retention of your personal data

BICS acknowledges the importance of the protection of personal data. We do not retain your personal data no longer than strictly necessary for the realization of the purposes for which we received the data, or for the execution of a contract or fulfilling a legal obligation.

The personal data that we collect based on your consent will be kept by us for as long as your consent remains valid.

In all cases, personal data may be retained for a longer period if there is a legal or regulatory reason to do so, or for a shorter period if the data subject objects to the processing of his/her personal data and if there is no longer a legitimate reason to retain them.

Protection of Personal Data

We have taken technical and organizational measures to protect the databases in which your data is kept against unauthorized access, unauthorized use, theft or loss. Our security measures are regularly evaluated and adapted so that we can continue to provide a high level of protection. Please note, though, that no website or internet transmission is completely secure, so while we strive to protect your data, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will never occur.

Your wish for privacy

You can read below how you can inform BICS of your preferences with regard to your privacy. We do our best to update our systems and databases to the extent technically feasible and as quickly as possible but bear in mind that it nevertheless takes some time to implement your choice in practice.

- If you are not a customer of BICS, see the 'How to contact us' section.
- If you have a MyBICS account, use the contact tab in the customer portal to reach to our customer care department or your account manager.

Your rights in relation to personal data

You have certain rights in relation to your personal data that is held by us, and we respect and observe these rights.

Such rights may include the rights to: ask us to confirm that we are processing your personal data, ask us for a copy of your personal data (including information regarding who we share your personal data with); to correct, delete or restrict (stop any active) processing of your personal data; to limit the use and disclosure of your personal data; and to ask us to share (port) your personal data to another person.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where applicable, you can also

withdraw the consent you have given us to process your personal data and request information on the consequences of not providing such consent.

These rights may be limited, for example: if fulfilling your request would reveal personal data about another person; where it would infringe the rights of a third party (including our rights); or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Nevertheless, we will consider each of the cases individually and try to satisfy your request to best of our ability.

In order to make use of these rights, please send a request (dated and signed) to the BICS Data Protection Officer (dpo@bics.com).

If, at any time, you believe that BICS infringes your privacy, you have the right to lodge a complaint with the Belgian Data Protection Authority: Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, e-mail: contact@apd-gba.be.

Changes to our Privacy Policy

We may change our Privacy Policy from time to time. If we make changes, we'll revise the "Last Updated" date at the top of this policy, and we may provide additional notice such as on the BICS Site homepage. If we make any material changes to this notice, BICS will notify you of those changes through a notice on the BICS Site or through other reasonable means of communication, such as email. We will comply with applicable law with respect to any changes we make to this notice.

How you can contact us

You may write to us at the following address: BICS SA, Privacy Office, Boulevard du Roi Albert II 27, 1030 Brussels, Belgium or send an e-mail to dpo@bics.com.

LEAs having the authority to send requests to BICS SA/NV may send their requests to lea@bics.com.