

DOCUMENT SET : Business Management System - POLICY

TITLE : LU1\Service Comptable et Financier - P01 **Privacy Policy**

ABSTRACT : Translation of the data protection law into Telindus' policy

VERSION : 2.1 Issue date 07 Jan 09

FILE : LU1_Service Comptable et Financier - P01 Privacy Policy V2.1.doc

OWNER : RODER Laurent

AUTHORITY : ROB Marc

DOCUMENT CONTROLLER : CAMY Marc

COMPLIANCE : JACQUES Laetitia

CHANGES : **New template**

For further information or remarks concerning the content of this document, please contact:

Name	ROB Marc
Company	Groupe Telindus Luxembourg
Phone	(+352) 53 28 20 -9372
Mobile	(+352) 621 200 372
e-mail	marc.rob@telindus.lu

CONTENTS

Page

1	PURPOSE	3
2	FIELD OF APPLICATION	3
3	DEFINITIONS & ABBREVIATIONS	3
4	PRIVACY POLICY	3
4.1	INFORMATION WE COLLECT	3
4.2	HOW WE SHARE INFORMATION.....	4
4.3	HOW WE PROTECT INFORMATION	4
4.4	DATA QUALITY AND ACCESS.....	4
4.5	ONLINE SPECIFIC STATEMENT	4
4.6	CONTACT INFORMATION.....	5
5	DOCUMENTS	6

1 PURPOSE

At Telindus, one of our top priorities is making sure that the information we have about you is protected and secure. We value the relationship with our customers and try to preserve their privacy. At the same time, the very nature of the relationship with the customers may result in us collecting or sharing certain types of information about them.

The Luxembourg law of 2nd august 2002 governs Telindus' collection of personal identifying information for the protection of persons in the context of treating personal data.

2 FIELD OF APPLICATION

This privacy policy is applicable for the Telindus Group Luxembourg.

3 DEFINITIONS & ABBREVIATIONS

Telindus Group Telindus PSF S.A., Telindus S.A., Telectronics S.A., Beim Weissenkreuz S.A.
Luxembourg

4 PRIVACY POLICY

4.1 INFORMATION WE COLLECT

We collect information:

- Which you give to us on applications, surveys, registration forms, etc.
- Which you give to us when you make a purchase, or other account information such as credit card usage.
- Which others give to us to make sure that the data you provide is accurate and up-to-date. This may include information about you from employers.
- On seminars or other events where there is an exchange of visiting cards.

We treat these information :

- To ensure the delivering of the requested services and products.
- To execute a sales contract.
- To optimally organize an even.
- To inform you about news from Telindus, new technologies, new services...
- To process transactions (purchase/account data).
- To respond to your inquiries.

We keep these information :

- As long as legally required (accounting data, contracts....).
- As long as the duration of the trade relation.
- Certain contact information for canvassing are held in our databases until you inform us that you don't want to be contacted by us anymore.

4.2 HOW WE SHARE INFORMATION

- We share information between Telindus' affiliates in Luxembourg.
- To respond to your enquiries, it can happen that we share personal information with our partners, our parent company (Telindus Group), or other Telindus offices in Europe. This is done when they perform services on our behalf.

4.3 HOW WE PROTECT INFORMATION

We strive to protect your data and safeguard it from unauthorized individuals. We commit ourselves to the ISO quality certification what expresses our responsibility on processing data in a safe and secure way.

4.4 DATA QUALITY AND ACCESS

The accuracy of your individual identifying information is important to us. We are working on ways to make it easier for you to review and correct the information that Telindus maintains about you, since you are entitled to reviewing, amending and removing your personal data. Should you want to see any information we have about you or do you want to execute your rights, please contact us directly. (See contact details at the end of this statement).

4.5 ONLINE SPECIFIC STATEMENT

- Collection of data for statistics and reporting

When you link up to the Telindus website to view information or to download files we automatically collect the following data:

- Type of domain name used to gain access to the Internet (f.e. .com, .org).
- The IP address attributed during the connection.
- Date and time of access to the site.
- Duration of site/page visit.
- Browser used.
- The operating system or platform installed on your personal computer or the access device used.
- Search engine and meta tags used to track the Telindus website on the web.
- Type and nature of files or information that has been downloaded.

These log files are intended to map the number of visitors on various sections of our website and to continuously improve the content of the site.

- Use of cookies

A cookie is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you've visited, but the only personal information a cookie can contain is information you supply yourself. A cookie cannot read data off your hard disk or read cookie files created by other sites.

When accessing information stored in a database format, a basic version of cookies is used to transfer an answer to the user who has initiated a question.

Nowhere on the Telindus site however are cookies being used that store specific information on the user or surfer. Cookies on the Telindus site serve a more functional purpose i.e. they are generated by an IIS web server (Internet Information Server), stored in the memory of the browser implicating they disappear once the browser session has been terminated.

- Links to external sites

Telindus web sites may contain links to external sites. Telindus is not responsible for the content and the privacy practices of other web sites, and encourages you to examine each site's privacy policy and disclaimers in order to make your own decisions regarding the accuracy, reliability and correctness of material and information found there.

- Applications, surveys, registration forms

Telindus has to collect certain information in order to be able to provide all requested services. Compulsory indications will be expressly highlighted in applications, surveys, registration forms...

4.6 CONTACT INFORMATION

You are welcome to give us your comments about this privacy statement, please contact us by:

E-mail : privacy@telindus.lu

Phone: +352 45 09 15 1

Postal mail to:

Telindus S.A.
B.P. 39
L-8001 STRASSEN

5 DOCUMENTS

LU1/Service Comptable et Financier – P01 – 001

Privacy statement

Description	: Translation of this policy to the official text published on Internet
Users	: Service du Personnel, Marketing, ICT, CODIR
Frequency	: Actual version, updates when decided by CODIR
Processing	: Service du Personnel > CODIR > Marketing
Filing	: Dossier "Protection des données"
Archiving	: Unlimited

LU1/Service Comptable et Financier – P01 – 002

Privacy@Telindus Guidelines

Description	: General Guidelines to protect personal data
Users	: All employees of the Telindus Group
Frequency	: Actual version, updates when decided by CODIR
Processing	: Service du Personnel > News & Infos
Filing	: Dossier "Protection des données"
Archiving	: Unlimited