Business

PRIVACY NOTICE
FOR ORANGE BUSINESS CORPORATE CUSTOMERS AND PROSPECTS*

Introduction

Orange Business provides a range of solutions tailored to its customers' needs. In doing so, Orange Business processes certain Customer Personal Data (as defined in section 1).

Orange Business is committed to protect Customer Personal Data in accordance with applicable personal data protection and information security laws, including but not limited to the EU General Data Protection Regulation 2016/679 (the "**GDPR**"), the EU ePrivacy legislation, and other applicable national personal data protection laws.

Orange Business is made up of several legal entities in a number of countries. This privacy notice is issued on behalf of all the Orange Business entities.

This privacy notice explains how the Orange Business entities ("**Orange Business**", "**we**", "**us**" or "**our**") use and protect Customer Personal Data and provides information about the rights individuals have in respect of their Customer Personal Data.

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* (formerly known as Privacy Policy for Orange Business Services Corporate Customers and Prospects)

1. Definitions

Controller	has the meaning set out in the GDPR (or of the nearest equivalent term in the applicable data protection legislation); in short, it is the company that (alone or jointly with others) determines the purposes and means of the processing of Personal Data
Customer	a customer or potential customer of Orange Business who is a business, enterprise or other organization, to the exclusion of natural persons
Customer Personal Data	(a) Personal Data that we collect from Customer representatives during our relationship with Customers, such as when Customers approach us to ask about our services, or when we communicate with Customers during the provision of our services ("**Customer Representative Personal Data**"); and (b) Personal Data that relates to End Users provided to us by Customers or generated by us in connection with the services that we provide to Customers ("**End User Personal Data**")
Customer Representative	a natural person interacting with us on behalf of a Customer
End User	the natural persons who are the users of the solutions that we implement for Customers, such as for example Customer employees or clients
Personal Data	any information relating to an identified or identifiable natural person
Processor	has the meaning set out in the GDPR (or of the nearest equivalent term in the applicable data protection legislation); in short, it is the company that processes Personal Data on behalf of the Controller

2. The scope of this privacy notice

What information does this privacy notice relate to?

This privacy notice applies to Customer Personal Data that Orange Business processes in connection with its relationship with its Customers. This privacy notice describes our general Personal Data protection framework and does not change the content of any individual contract signed with our Customers.

This privacy notice does not apply to the Personal Data of natural persons who are contracting directly with Orange Business for the provision of a service such as natural persons who subscribe directly a mobile internet access service from Orange Business. The privacy notice of Orange Business in respect of the Personal Data of customers who are natural persons is provided together with the terms of use pursuant to which Orange Business provide the service.

Our services are not intended for use by children, and we do not knowingly collect Personal Data relating to children.

The importance of reading this privacy notice, and keeping us updated

It is important that you read this privacy notice together with any other privacy notice or related information we may provide on specific occasions, so that you are fully aware of how and why we use Customer Personal Data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

It is important that all Customer Personal Data that we hold is accurate and current. Please keep us informed if you become aware that any Customer Personal Data has changed during your relationship with us.

Third-party links

Our website *www.orange-business.com* may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share Personal Data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, please read the privacy notice of the other websites/services that you visit.

Changes to this privacy notice

Our privacy notice is regularly reviewed. This version was last updated in November 2026.

3. Who we are and our contact information?

Controller

An Orange Business entity acts as a Controller in respect of all Customer Personal Data collected or generated by Orange Business for its own purposes, independently of its Customers' requirements and for which the Orange Business entity solely determines the means of the processing outside of the contractual documentation agreed with the Customer.

Any Orange Business entity operating as an electronic communications service or network provider and each third-party electronic communications service or network provider interconnected with an Orange Business entity may act as a Controller in respect of:

- End Users electronic communications metadata we process in order to build, operate and secure the Orange Business network;
- End Users electronic communications metadata we process in order to transmit their electronic communications and, as regards voice communications, the Call Detail Records (CDRs) we process to produce the traffic details required for the invoice;
- End User Personal Data we process to perform activities that applicable law requires electronic communications providers to undertake, such as monitoring for intrusion / fraud detection / security weaknesses and dealing with requests from law enforcement, security or regulatory authorities.

The Orange Business entity engaging with you may act as a Controller in respect of Customer Representative Personal Data, in relation to any Orange Business sales or marketing activities, surveys, customer satisfaction or service improvement programs, events invitation and management activities that involve such Customer Representative Personal Data.

Orange S.A. (Orange Business division) is the Controller in respect of the Personal Data of Customers Representatives processed through our website www.orange-business.com. The Controller of any other public website is the Orange Business entity identified as the editor on the relevant website.

Orange Business may act as Controller in respect of Customer Personal Data for data analysis for its own purposes.

For further details on our processing activities as Controller and the type of Personal Data processed, please see section 5.

Processor

The Orange Business entity you contract with as a Customer acts as a Processor in respect of all Customer Personal Data collected or generated by Orange Business in order to provide its services to the Customer, on its documented instructions, and not for any other purpose.

Each Customer defines the purpose of the processing of the Customer Personal Data by specifying the services it procures from Orange Business entities and its end-users to which the service must be provided. The means of the processing are described in the contractual documentation agreed by Customer and the Orange Business entity.

For further details on our processing activities and the type of Personal Data processed, please see section 5.

Data protection officer

We have appointed a global data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. We also have appointed local data protection officers where required. For requests to exercise your rights, please refer to section 10.

Contact details

For enquiries to the Chief Data Protection Officer or to any local data protection officer:

Email: obs.dpo@orange.com

Or; for enquiries relating to France only:

Email: obs.francedpo@orange.com

4. What Customer Personal Data may we collect?

We may collect, use, store and transfer different types of Customer Personal Data which we have categorised in the table below.

Category	Personal Data in category
Billing Data	the consumption data that Orange Business collects from services that it provides to its Customers in order to calculate charging as well as billing information, to the extent related to natural persons.
Contact Data	first name, last name, email address, postal address and telephone numbers, job role within the Customer.
Support Data	Customer Representatives' or End Users' service ticket information, Customer Representatives' or End Users' telephone recordings for incident.
Identity Data	first name, last name, honorific (e.g. Ms, Mr. Dr.,…), username or similar identifier, password, ID document / number.
Location Data	geographic location, device location, SIM card location for mobile services.

Marketing and Communications Data	preferences in receiving marketing from us and/or third parties and communication preferences.
Profile Data	interests, preferences, comments, questions, feedback and survey responses.
Technical Data	internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, as well as other technology on the devices natural persons use to access areas of our website or other technical data generated through the use of the service.
Traffic / Connection Data	data revealing a communication's origin, destination, route, format, size, time duration, IP address, time zone setting, MAC address.
Hosted Data	any categories of Customer Personal Data that may be recorded or stored (such as voicemails, call recordings, files) by Customer and which is hosted on the cloud infrastructure provided by Orange Business (e.g. IaaS, PaaS, SaaS ...) including personal data considered as special categories of personal data under applicable law.
Usage Data	information about how End Users use our products and services and how natural persons use our website.
Visual Data	photographs and other visual records we take during Orange Business' or third parties' events or that we process based on your consent.

We collect Personal Data from the following categories of sources: our customers, suppliers, partners or directly from you.

When the processing of Customer Personal Data is subject to Swiss law, it is clarified that the Customer Personal Data shall not be considered as secret data.

Aggregated/anonymised data

We also collect, use and share aggregated and anonymised information such as statistical or demographic information. Aggregated or anonymised data could be based on Customer Personal Data but is not legally considered to be Personal Data. For example, we may aggregate or anonymise Usage Data to calculate the percentage of users accessing a specific function on our website. If we combine or link aggregated or anonymised data with any Customer Personal Data so that it can identify an individual, we treat the combined data as Personal Data which will be used in accordance with this privacy notice.

Special categories of Personal Data

We may process, as Processor, "special" or "sensitive" categories of Personal Data (information revealing race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data or data concerning sex life or sexual orientation) relating to Customers or End Users, only if it is contained in Hosted Data. However, we do not collect it for our own purposes and we are not aware of when we are processing such

Personal Data (except in the framework of hosting services in the health sector) and, we don't use such Personal Data outside of a data subject's reasonable expectations.

5. How do we use Customer Personal Data as Controller and Processor?

The tables below show how we use Customer Personal Data for which we are Controller and our legal basis for doing so (including a description of our legitimate interests), as well as how we use Customer Personal Data for which we are Processor.

The contract between a Customer and an Orange Business entity will include further information on Customer Personal Data which we process as Processor and the respective obligations of the parties regarding the processing of Customer Personal Data.

Customer Personal Data for which we are Controller		
Our Activity	**Categories of Personal Data processed**	**Our lawful bases for processing**
To manage the sales and contractual relationships with our Customers	Contact Data Identity Data Profile Data Billing data Traffic/Connection Data Marketing Data and Communications Data	• Necessary for our **legitimate interests** to develop and manage our sales activities and the relationship with our Customers, including ordering, billing and collection of payments • **Consent** where required • Necessary to comply with **legal obligations** we may have under applicable laws (for example, electronic communications regulations and e-privacy regulation, tax laws etc…)
To build, operate and secure our network	Traffic / Connection Data	• Necessary for our **legitimate interests** to assess the amount of data moving across our network at a given point in time, to manage such data • Necessary to comply with **legal obligations** (to prevent or detect fraud)
To assist national law enforcement / security agencies, to respond to requests from public, governmental and regulatory authorities, to comply with court orders, litigation procedures and other legal processes	All	• Necessary to comply with **legal obligations** we may have under applicable laws (for example to provide lawful intercept and/or data retention by national law enforcement / security agencies)

Customer Personal Data for which we are Controller		
Our Activity	**Categories of Personal Data processed**	**Our lawful bases for processing**
To complete a survey, provide customer satisfaction feedback, take part in service improvement programs, and attend any events that we organise	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Visual Data	• Necessary for our **legitimate interests** to study how Customers use our products/services, to try to increase and improve interaction with Customers, to find out how we can improve our services, and to develop and grow our business, to communicate about our events
To make suggestions and recommendations to you about goods or services that may interest you	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data	• Necessary for our **legitimate interests** to develop our products/services, grow our business and maintain our Customer relationships • **Consent** where required
To administer and protect our business, services and our websites	Contact Data Technical Data	• Necessary for our **legitimate interests** to run our business, provision of administration and IT services, network security, cloud security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise • Necessary to comply with a **legal obligation**
To provide access to you, as an individual, to on-line portals for your own individual usage management	Identity Data Contact Data Technical Data Profile Data	• Necessary for the **legitimate interests** of your organisation, our Customer, to provide you with this feature to improve and facilitate your use of the service; • Necessary for our **legitimate interests** to study how you use our service, to try to improve interaction with you, to find out how we can improve our services, and to develop and grow our business
To use data analytics to improve: our website, products/services, marketing or Customer relationships and experiences	Depending on the activity, certain: Contact Data Support Data Profile Data Marketing and Communications Data	• Necessary for our **legitimate interests** to manage or improve/develop our products, services, offers, marketing strategy, keep our websites updated and relevant

Customer Personal Data for which we are Controller		
Our Activity	**Categories of Personal Data processed**	**Our lawful bases for processing**
	Technical Data Usage Data	

Customer Personal Data for which we are Processor	
Our Activity	**Categories of Personal Data processed**
Delivering, activating and implementing services and changes to services requested by Customer (including intrusion detection and monitoring services ordered by Customer)	Identity Data Contact Data Support Data Profile Data Hosted Data Technical Data
Incident management (troubleshooting, resolution and reporting) related to a specific Customer	Identity Data Contact Data Support Data Technical Data Profile Data Hosted Data
Providing reports to Customer on billing, usage, quality of service and other reports required by the Customer	Identity Data Contact Data Billing Data Support Data Traffic/Connection Data Profile Data Location Data Hosted Data
Providing access to Customer portals, on-line tools and other applications managed by Orange Business for the provision of services to its Customers (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Technical Data Profile Data
Hosting Customer data and infrastructure	Hosted Data

Marketing

We provide Customers with choice regarding the use of Customer Personal Data around marketing and advertising. You can always ask us to stop sending you marketing messages by contacting us at any time.

You will receive marketing communications from us if you have provided your consent to receive those communications (unless we are exempted to obtain consent under applicable laws).

Tracker

A tracker is an invisible image which, when displayed, transmits data from the recipient to the sender of the email or electronic message.

We may use tracker in our communications in accordance with applicable law.

Cookies

We use necessary cookies to make our website work and we may also use optional cookies to help us improve our website. For more information about the cookies we use and how to disable them, please see our cookie policy *here*. Our online tracking is not of the nature such that it qualifies as "selling" or "sharing" under California law and we do not have actual knowledge that we have sold or shared the Personal Data of anyone under 16 years old.

6. To whom may we disclose Customer Personal Data?

As a Processor of the Customer Personal Data

We disclose Customer Personal Data to other Processors, whether other entities within Orange Business or external providers, that we engage in our capacity as Processor for carrying out specific processing activities on behalf of our Customer, the Controller.

We inform our Customers of all the Processors (other entities within Orange Business and external providers or partners) we engage under a general written authorization (or specific authorization).

We may share some Customer Personal Data with third parties acting as Controllers in their own rights. For example, to deliver you a parcel we share your Contact Data with courier companies.

As a Controller of the Customer Personal Data

We may share Customer Personal Data as Controller of such data with the parties set out below for the purposes set out in the table in section 5 above.

Orange Business entities

The Orange Business entity which is the Controller of your Personal Data may share such Data with other Orange Business entities acting as Processors. The list of countries where Orange Business entities are located can be found on Orange Business' website (*about us/where we are*).

External parties

Service providers acting as Controllers in their own rights, in which case the processing of Customer Personal Data will be subject to these service providers' privacy policies. For example, to provide transmission to carry traffic on our network we share Traffic/Connection Data with other regulated providers of electronic communications or to distribute third parties' applications/software, which are used directly by the End-Users in accordance with the privacy notice of those third parties.

Service providers acting as Processors, such as providers of IT and system administration services, maintenance, expert technical support or hosting.

National authorities (such as tax authorities), agencies and regulators acting as Processors or Controllers who have the legal authority to require reporting of processing activities or disclosure of Customer Personal Data in certain circumstances.

7. International Transfers of Customer Personal Data

We may transfer and process Customer Personal Data to/in countries other than the country in which the Customer Personal Data is initially collected. Please see Annex 1 to this document for the list of countries where Orange Business may transfer Customer Personal Data.

International transfers to Orange Business entities

We may transfer Customer Personal Data amongst Orange Business entities as Controller or Processor, inside or outside of the European Union ("EU").

All Orange Business entities have signed an intra-group agreement for processing and transferring personal data, which includes the EU Commission standard contractual clauses. This intra-group agreement defines the adequate safeguards all Orange Business entities must put in place to protect Personal Data and its transfer. For more information about the transfer of Customer Personal Data to Orange Business entities for a specific processing activity, please contact us.

International transfers to external suppliers

When we transfer Customer Personal Data to an external supplier in another country, we make sure that a similar degree of protection is afforded to the Customer Personal Data. For transfers outside of the EU or to a country which the EU Commission has not assessed as providing an adequate level of protection (for further details, see the relevant page of the European Commission website *here*), we use the EU Commission standard contractual clauses or another appropriate safeguard.

International transfers from Switzerland

When an Orange Business entity located in Switzerland transfers Personal Data to an Orange Business entity or an external supplier in a country not recognised by Switzerland as providing an adequate level of protection, Orange Business signs the EU Commission standard contractual clauses adapted to Swiss law, as appropriate safeguards.

8. Our data security practices

We have put in place appropriate security measures to prevent Customer Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Customer Personal Data to those employees, agents, contractors and other third parties who have a business need to access it. They will only process Customer Personal Data on our instructions and they are subject to a duty of confidentiality.

We require all third parties to respect the security of Customer Personal Data and to treat it in accordance with applicable data protection laws.

We have put in place procedures to deal with any suspected Personal Data breach and will notify Customers and any applicable regulator of a breach where we are legally or contractually required to do so.

9. Our data retention policy

How long will we retain Customer Personal Data?

We retain Customer Personal Data in respect of which we are Processor for the period agreed with our Customer, the Controller, unless applicable law requires us to retain it for a longer period (e.g. regulatory, tax or accounting obligations). We may also retain Customer Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with our Customers, including as evidence. Our contractual documentation agreed with our Customer describes the retention periods for the processing activities we perform as Processor for our Customer, the Controller. We retain Customer Personal

Data in respect of which we are Controller only for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. To determine the appropriate retention period for Customer Personal Data in respect of which we are Controller, we consider:

- the amount, nature and sensitivity of the Customer Personal Data;
- the potential risk of harm from unauthorised use or disclosure of Customer Personal Data;
- the purposes for which we process Customer Personal Data and whether we can achieve those purposes through other means; and
- the applicable legal, regulatory, tax, accounting or other requirements.

10. Data subjects' rights

Which are the data subjects' rights?

Under certain circumstances, individual Customer Representatives or End Users may have the following rights under data protection laws in relation to their Personal Data:

- request **access** to, **correction** of, or **erasure** of Personal Data, including the right to know the following about your Personal Data: the categories of Personal Data collected, the categories of sources from which the Personal Data has been collected, our purposes for doing so, with whom we have shared that Personal Data, and the specific pieces of Personal Data that we have collected;
- **object to processing** of Personal Data;
- request **restriction of processing** of Personal Data (except that we do not sell or share Personal Data and do not use sensitive Personal Data in a manner that provides an opt out right under California law);
- request **transfer** of Personal Data to another organisation;
- **withdraw consent** to processing of Personal Data;
- **make a complaint** to the relevant national data protection regulator (such as the Information Commissioner's Office (ICO) in the UK – www.ico.org.uk, or the Commission Nationale de L'Informatique et des Libertés (CNIL) in France – www.cnil.fr/fr).

We will not discriminate or retaliate against you for exercising your Personal Data protection rights.

Whom should you contact?

- If you want to exercise your rights in respect of your Personal Data of which Orange Business is a Controller:
    - For Traffic/Connection Data: we do not identify the individual to which Traffic/Connection Data relates. We only identify the Customer to which Traffic/Connection Data relates. Traffic/Connection Data is also subject to confidentiality obligations under our agreements with our Customers. Therefore, in order to exercise your rights in respect of your Personal Data that is Traffic/Connection Data, you should contact your employer, or the organisation through which you have been using Orange Business' services. The person(s) authorised by your organisation to ask our assistance in respect of your request will contact us.
    - For other Personal Data of which Orange Business Service is a Controller, you can contact us by using the online contact form or emailing us at obs.dpo@orange.com. Alternatively, you can fill and print the form and send it by post to:

Orange Business
DPO Office (Legal Department)
1 Place des Droits de l'Homme, 93579 La Plaine St Denis, France.

- If you want to exercise your rights in respect of your Personal Data of which Orange Business is a Processor for a Customer: you should contact your employer, or the organisation through which you have been using Orange Business' services in the first instance, to obtain information about, or exercise, the rights you may have in respect of your Personal Data. The person(s) authorised by your organisation to ask our assistance in respect of your request will contact us.
- If you are authorised by our Customer to ask Orange Business' help in answering a data subject request, you can contact us through your "My Service Space" portal or your "Espace Entreprise Client" portal.

How will Orange Business deal with my request?

Usually no fee

You will not have to pay a fee to access your Personal Data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we require

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. You may also ask for an authorized agent to submit a request on your behalf and (if you do so) your agent should submit evidence of their authority.

When we will respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

Annex 1 – Countries where Customer Personal Data may be processed/transferred

Argentina	Australia	Austria
Belgium	Brazil	Bulgaria
Canada	Chile	China
Colombia	Croatia	Czech Republic
Denmark	Egypt	Finland
France	Germany	Ghana
Greece	Hong Kong	Hungary
India	Ireland	Israel
Italy	Ivory Coast	Japan
Kazakhstan	Lebanon	Luxembourg
Madagascar	Malaysia	Mauritius
Mexico	Morocco	Netherlands
New Zealand	Nigeria	Norway
Pakistan	Peru	Poland
Portugal	Russia	Qatar
Romania	Singapore	Saudi Arabia
Senegal	Spain	Slovakia
South Korea	Thailand	Sweden
Switzerland	Ukraine	Taiwan
Turkey	Tunisia	United Arab Emirates
United Kingdom	Vietnam	United States