



Privacy Notice on the Protection of Personal Data Live Intelligence

The Live Intelligence platform provides access to generative AI assistants made available to your organization (company or public body) by Orange Business. This generative AI tool corresponds to a large language model (LLM) accessing a documentary corpus provided by your organization, presented as a conversational agent.

This tool allows interaction with this knowledge model by asking general and specific questions in the context of your organization's activities. It also enables uploading files and submitting questions related to those files.

Access rights to this generative AI tool are granted to you by your organization.

1. Identity and contact details of the data controller:

Your organization, which has granted your access to the tool, acts as the data controller for the purposes described below.

Orange Business also acts as a data controller for two of listed purposes.

2. Purposes – why the data is collected:

Purpose	Controller	Data Processed	Mandatory/ Optional	Legal Basis	Retention Period
Access to the platform	Your organization*	First name, last name, professional email address, IP address	Mandatory	Employment contract performance	For the period necessary to provide the Service
Use of the generative AI service (LLM)	Your organization*	Free-text question submitted to the tool	Mandatory	Employment contract performance	6 months
Use of generative AI based on organizational documents	Your organization*	Data contained in the documentary corpus provided by your organization	Mandatory	Employment contract performance	For the period necessary to provide the Service
Research and optimization of the organization's documentary corpus	Your organization*	Data potentially included in suggestions, evaluations, reports	Optional	Legitimate interest	6 months

Usage statistics	Orange Business Services S.A*	Free-text question/answer, number of prompts	Mandatory	Legitimate interest	6 months
Detection of non-compliant use with the Terms of Service (CGU).	Orange Business Services S.A*	User ID, free-text question/answer, number of prompts	Mandatory	Legitimate interest	6 months

* See section 3.3 Respective Responsibilities

Analysis of platform usage is based on personal information but does not produce any results with a direct impact on the user.

3. Recipients or Categories of Recipients of Data

3.1 : Definition

Controller: the entity (person, authority, or body) determining the purposes and means of processing.

Processor: the entity (person or body) processing data on behalf of a Controller, for a service.

3.2 Recipients

- Your organization
- ORANGE BUSINESS SERVICES S.A.
- Google Ireland Ltd
- Open AI Ireland Ltd

Appropriate security measures are implemented to prevent accidental loss, unauthorized use, access, alteration, or disclosure of personal data. Access is limited to employees and agents requiring it for professional purposes, bound by confidentiality obligations. Procedures are in place to handle any suspected personal data breaches.

3.3 Respective responsibilities

If your organization is the **Controller**:

- Controller: Your organization
- Level 1 Processor: Orange Business Services S.A.
- Level 2 Processors: Google Ireland Ltd and OpenAI Ireland Ltd

If Orange Business is the **Controller**:

- Controller: Orange Business Services S.A.
- Processor: N/A

3.4 Your rights

You have the rights under the General Data Protection Regulation (access, rectification, erasure, restriction of processing, object to processing, data portability and other applicable data protection legislation)

You may also lodge a complaint with your data protection authority.

These rights are not absolute (e.g., data subject to legal retention obligations cannot be erased). Any limitation will be duly communicated when you exercise your rights.

What are my rights regarding my personal data?

Request access to, correction of, or erasure of personal data, including the right to know the following about your personal data;

- object to processing of personal data;
- request restriction of processing of personal data;
- request transfer of personal data to another organization.

4. Data Protection Officer Contact Details

For any questions relating to this notice and/or to exercise your rights as described above, you may contact your organization.

If you wish to exercise your rights regarding your personal data processed by Orange Business and its sub-processors in their capacity as Processor on behalf of your organization: you must contact the representative of your organization, or the entity through which you first used the services, in order to obtain information on your rights and how to exercise them. The person(s) authorized by your organization to request our assistance in relation to your request will then contact us.

If you wish to exercise your rights regarding your personal data processed by Orange Business in its capacity as Controller, you may contact Orange Business by using the online contact form or by sending an email to obs.dpo@orange.com.

5. Processing of Personal Data by the User

It is acknowledged that, incidentally, personal data may appear in documents used on the Live Intelligence platform.

The user must respect the following principles when entering information:

- Use of Live Intelligence must not be centered on personal data processing: no profiling, decision-making, or deductions about individuals.
- Where possible, remove personal data before uploading documents.

Use of Live Intelligence must not amount to systematic personal data processing. If such a need arises, the user must contact their organization.

6. Modification of this Privacy Noticed

This notice may be updated from time to time. You are encouraged to review this page regularly to ensure you are aware of the latest version.