

# WEBSITE PRIVACY POLICY

Last update: 25/05/2018

Welcome to our website privacy policy

ATOZ and all its affiliated Companies including **LTCO** (together “**ATOZ Group**”) respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we process your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how you are protected.

This privacy policy aims to give you information on how ATOZ Group collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and is not intended to override them.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. *WHO WE ARE*
2. *KIND OF DATA WE COLLECT ABOUT YOU*
3. *HOW IS YOUR PERSONAL DATA COLLECTED*
4. *HOW WE USE YOUR PERSONAL DATA*
5. *DISCLOSURES OF YOUR PERSONAL DATA*
6. *INTERNATIONAL TRANSFERS*
7. *DATA SECURITY*
8. *DATA RETENTION*
9. *YOUR LEGAL RIGHTS*

## PREAMBLE

**GDPR** means EU Regulation n°2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

**Data Laws** means GDPR and any other data protection law applicable to the Grand Duchy of Luxembourg

**Personal data, or personal information**, means any information about an individual from which that person can be identified. It does not include data where identifying information has been removed (anonymous data).

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and weight any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**External Third Parties** means:

- Service providers, acting as processors, who provide IT and system administration services such as Google Analytics.
- Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Event organisation professionals including caterers, event and communication agencies, photographers, and videographers

## 1. WHO WE ARE

This privacy policy is issued on behalf of ATOZ Group so when we mention «ATOZ », “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the ATOZ Group responsible for processing your data. ATOZ is the controller and is responsible for this website.

### **Controller:**

#### **ATOZ, société anonyme:**

Mailing address: 1B rue Heienhaff, L-1736 Senningerberg – BP 2071, L-1020 Luxembourg

Phone number: (+00352 269401)

Establishment year: 2004

National VAT Number: 20042209164

International VAT Number: LU20139476

Trade register Number: B101128

Number of employees (Group): 208

Capital: 300 000 €

### **WEB Master:**

FIAD SA - 1 B Heienhaff - L-1736 Senningerberg

### **WEB Hosting:**

E-Teq – 16, rue Ferdinand Kuhn - L-1867 Howald

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out above or this email address: [GDPR@atoz.lu](mailto:GDPR@atoz.lu)

You have the right to make a complaint at any time to the *Commission Nationale pour la Protection des Données (CNPD)* which is the Luxembourg supervisory authority for data protection issues (<https://cnpd.public.lu/en.html>). However, we would appreciate the chance to deal directly with your concerns. Therefore, before you approach the CNPD please contact us first.

## **YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. This may include a change to your physical or electronic address, your company, your job title, etc.

## **THIRD-PARTY LINKS**

This website 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 data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. KIND OF DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes delivery address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website.
- **Marketing and Communications Data** includes your preferences in receiving marketing material from us and your communication preferences. For the purposes of catering during events, we also collect and store data regarding your dietary restrictions, in the case where you provide this information to us. Please note that this information will only be transmitted in aggregate form, with no identifying data. Your picture may also be taken during an event and shared to social media and on our website. You have the right to refuse that a picture of you, individually (not as part of a group), appears. This choice can be made directly when registering to the event.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data by law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Please note, if you would like to subscribe to the newsletter/invitation mailing list and you do not provide us with the relevant contact information and express consent, we may not be able to fulfil the request

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms, providing your business card or by corresponding with us by post, phone, e-mail or otherwise. This includes personal data you provide when you:
  - subscribe to our service or publications;
  - request marketing material to be sent to you;
  - give us feedback through a survey;
  - comment on our blog;
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Visitor Statistics provider such as Google Analytics
  - Networking/Social website provider such as LinkedIn/Facebook/etc.
  - Your own company's website, if your contact data is publicly available

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when permitted by law or with your active consent. Most commonly, we will use your personal data in the following circumstances:

- When we need to send you our newsletter or invitation to our events and technical seminars or webinars.
- When we need to create badges or attendance lists for event.
- When we need to analyse your CV information after having received your job application
- When it is necessary for our legitimate interests and your interests and fundamental rights to not override those interests.
- When we need to comply with a legal or regulatory obligation.

Generally, we rely on consent as a legal basis for processing your personal data in relation to sending direct marketing communications to you via email.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Purpose/Activity	Lawful basis for processing data, including basis of legitimate interest
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>• Sending our newsletter and news alerts</li> <li>• Inviting you to our Events and events from our partners and network</li> <li>• Asking you to leave a review or take a survey</li> <li>• Notifying you about changes to our terms and conditions or privacy policy</li> <li>• Analysing your job application</li> </ul>	<ul style="list-style-type: none"> <li>• Your active consent</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how our website is used)</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content to you and measure or understand the effectiveness of the communication we serve to you</p>	<p>Necessary for our legitimate interests (to study how to grow our business and to develop our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, client relationships and experiences</p>	<p>Necessary for our legitimate interests (to define types of clients and services, to keep our website updated and relevant, to develop our business and our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## **THIRD-PARTY MARKETING**

We will never sell or share your personal data with any company outside the ATOZ Group for marketing purposes. We will only share your personal data as explained below under point 5.

## **UNSUBSCRIBE**

You can ask us to stop sending you marketing messages at any time:

- by following the unsubscribe link on any marketing message sent to you; or
- by contacting us at any time via direct mail to [info@ltco.lu](mailto:info@ltco.lu)

You can ask to be unsubscribed from receiving all marketing messages from ATOZ Group, or only for a specific marketing purpose. (e.g. Newsletter, Event invitation, etc.)

## **COOKIES**

For more information about what cookies are and how we use them on the LTCO website, please refer to our cookies policy

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Within ATOZ Group.
- External Third Parties as set out in the Preamble.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

In addition, we may have to share your personal data if subject to a judicial request by the competent authorities.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within the ATOZ Group. This will involve transferring your data outside the European Economic Area (**EEA**). We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

Some of our external third parties are based outside the European Economic Area (**EEA**), so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is available by ensuring that at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- When we use certain service providers, we may use specific contracts which give personal data the same protection as in Luxembourg.

## **7. DATA SECURITY**

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

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach when we are legally required to do so.

## **8. DATA RETENTION - HOW LONG WILL YOU USE MY PERSONAL DATA?**

We will only retain your personal data as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see 9. Your Legal Rights, below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have the right, to the fullest extent permitted by Data Laws, upon request:

- to access your personal data;
- to correct your personal data if it is inaccurate or incomplete;
- to object to the processing of your personal data under certain circumstances;
- to ask for the removal or deletion of your personal data;
- to ask for data portability under certain circumstances; and
- to withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you withdraw your consent, we may not be able to provide certain communication or services to you.

The above rights can be exercised by sending an email to ATOZ – at [GDPR@Atoz.lu](mailto:GDPR@Atoz.lu)

If you provide personal data to ATOZ Group about someone else you must ensure that you are entitled to disclose that personal data to ATOZ Group and that, without our taking any further steps, ATOZ may collect, use and disclose that personal data as described in this privacy policy. In particular, you must ensure that the Data Subject is aware of the various matters detailed in this privacy policy, as these matters relate to that Data Subject, including ATOZ's identity, how to contact ATOZ, ATOZ's purposes of collection, ATOZ's personal data disclosure practices (including disclosure to overseas recipients), the Data Subject's right to obtain access to Personal Data and make complaints about the handling of that Personal Data, and be informed of the consequences if the Personal Data is not provided (such as ATOZ's inability to provide services).

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 may refuse to comply with your request in these circumstances.

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.

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